



NEVADA AFFORDABLE HOUSING ASSISTANCE CORPORATION

POLICY MANUAL

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INTRODUCTION:

This policy manual of the Nevada Affordable Housing Assistance Corporation (NAHAC) is intended to be a useful tool for internal and authorized external parties, that will require use of the same, and is an integral element of NAHAC's overall internal control efforts.

BACKGROUND:

In 2003, the Nevada Housing Division of the Department of Business and Industry (NHD) based in Carson City, Nevada, a state Housing Finance Agency (HFA), formed the non-profit NAHAC. The primary purpose of NAHAC is to assist in lessening the burdens of Nevada government. As such, it has been tasked with assisting the State of Nevada (the "State") by:

- (i) Owning, acquiring, developing, leasing and managing single or multi-family housing located in the State;
- (ii) Providing funds or other benefits to facilitate single or multi-family housing located in the State;
- (iii) Providing subsidies or other benefits to targeted groups of individuals within the State necessary or appropriate to provide affordable or subsidized single or multi-family housing in the State;
- (iv) Promoting affordable or subsidized single or multi-family housing located in the State;
- (v) Financing affordable or subsidized single or multi-family housing in the State;
- (vi) Accepting and making grants for affordable or subsidized single or multi-family housing located in the State, and;
- (vii) Conducting or performing any ancillary or related activity in furtherance of the foregoing.

NAHAC's Board of Directors, subject to the limitations of the Articles of Incorporation and said Bylaws, is ultimately responsible for the activities and affairs of the Corporation (NAHAC) via their delegation to and oversight of NAHAC Management, as they deem necessary.

MISSION AND VISION

Mission Statement

The mission of NAHAC is to provide funds, subsidies, and/or other benefits to Nevada homeowners or other targeted groups of individuals within the State of Nevada in order to assist with affordable or subsidized single or multi-family housing. At a minimum, this will encompass consistently determining what the specific needs of Nevada homeowners are, and any other applicable needs of the individual communities therein. Liaisons with public and private partners, as applicable, will be consistently sought to achieve this overarching objective. NAHAC's qualified and trained team of professionals will provide this service in an efficient and effective manner, making the needs of eligible Nevada homeowners its top daily priority.

Vision Statement

As a support arm for the Nevada Housing Division, NAHAC's vision is to provide appropriate and timely assistance to eligible high-risk Nevada homeowners.



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GOVERNANCE

Policy Area: Administration	Number: 200.A
Initial Effective Date: 12-19-2013	Initial Approved Date: 12-19-2013
Revised Policy Effective Date: 12-02-2019	Revision – Date Approved: 12-02-2019
Approved by: NAHAC Board of Directors	
<p>PURPOSE:</p> <p>NAHAC’s by-laws provide guidelines for how the organization should be governed to achieve its purpose and maintain its non-profit tax status per section 501(c)(3) of the Internal Revenue Code. The by-laws are intended to define, at a minimum: the size of the Board of Directors and how it will function; the roles and duties of the Chairperson, Directors, and Officers; the rules and procedures for holding meetings, electing Directors, and appointing Officers; how grant monies will be distributed; and other essential corporate governance matters appropriate to the purpose of the NAHAC organization.</p> <p>POLICY:</p> <p>NAHAC’s Board of Directors will ensure that up-to-date by-laws are in place at all times. Should changes to the by-laws be necessary, the Board of Directors will direct that appropriate action be taken to do so. The by-laws will be formally reviewed and approved by the Board of Directors, including any changes, at least annually.</p> <p>RESOURCES:</p> <p>See Appendix I - Corporate By-Laws</p>	

CODE OF ETHICS, CONFLICTS OF INTEREST, AND BUSINESS CONDUCT

Policy Area: Administration	Number: 200.B
Initial Effective Date: 12-19-2013	Initial Approved Date: 12-19-2013
Revised Policy Effective Date: 12-02-2019	Revision – Date Approved: 12-02-2019
Approved by: NAHAC Board of Directors	
<p>PURPOSE:</p> <p>NAHAC understands the importance of providing a solid organizational structure in which sound ethics are continually spoken of and practiced by all board members, managers, employees, and all interested third parties with access to non-public NAHAC information. This environment assures, at a minimum, that conflicts of interest are not tolerated, and all business is conducted in an unassailable manner conducive to both the State of Nevada and U.S. Treasury expectations.</p> <p>POLICY:</p> <p>NAHAC will ensure that Code of Ethics guidelines exist to provide moral principles and value parameters in order to properly steer its daily business conduct. This will exist for the benefit and protection of, at a minimum: the NAHAC organization; NAHAC employees, and; all constituents and interested third parties (to encompass all internal and external business activities).</p> <p>NAHAC will also ensure that Conflict of Interest guidelines exist which will, at a minimum, require any NAHAC board member, manager, or employee to disclose a conflict/potential conflict in a timely manner.</p> <p>Further, NAHAC management will ensure that all third-party entities (vendors, service providers, housing counselors, etc.) are made aware of its contents in regard to the expectations that they act in good faith, meeting high ethical standards at all times, in all related transactions concerning NAHAC.</p> <p>NAHAC will monitor accordingly to ensure that employees will participate, at least once a year, in an orientation or training session to discuss employee compliance with the actual supporting guidelines. Additionally, at least once a year, each employee will be required to submit a signed acknowledgement in support of this policy and corresponding guidelines.</p> <p>RESOURCES:</p> <p>See Appendix II - Code of Ethics, Conflicts of Interest, and Business Conduct Guidelines</p>	

FRAUD MITIGATION, DETECTION, AND AWARENESS

Policy Area: Administration	Number: 200.C
Initial Effective Date: 12-19-2013	Initial Approved Date: 12-19-2013
Revised Policy Effective Date: 12-02-2019	Revision – Date Approved: 12-02-2019
Approved by: NAHAC Board of Directors	
<p>PURPOSE:</p> <p>NAHAC fully appreciates the gravity of its role given by the State of Nevada and its constituents as a sound steward over all monies granted to its care and oversight. As such, the trust that these monies will be properly protected and disbursed in a proper and efficient manner is taken very seriously by all NAHAC Officers and employees. A critical element in achieving this end is the implementation of a multifaceted organization-wide model of fraud prevention, detection and deterrence program focusing on both internal and external threats. An effective fraud program needs to encompass an understanding of, and commitment to, the creation and full adherence to approved policies and procedures from the Board of Directors down to all NAHAC employees – including all third-parties that interact with NAHAC (vendors, service providers, housing counselors, etc.).</p> <p>POLICY:</p> <p>NAHAC will ensure that effective Fraud Mitigation, Detection & Awareness Guidelines (guidelines) are in place at all times. These guidelines will be communicated to all NAHAC personnel upon hire, and annually thereafter. NAHAC management will also ensure that all third-party entities (vendors, service providers, housing counselors, etc.) are made aware of its contents in regard to the expectations that they act in good faith, meeting high ethical standards at all times, in all related transactions concerning NAHAC. Each employee will be required to submit a signed acknowledgement for the foregoing guidelines and this policy at least annually, to be included in their personnel file.</p> <p>RESOURCES:</p> <p>See Appendix III - Fraud Mitigation, Detection, and Awareness Guidelines</p>	

CONTRACTS AND AGREEMENTS

Policy Area: Administration	Number: 200.D
Initial Effective Date: 12-19-2013	Initial Approved Date: 12-19-2013
Revised Policy Effective Date: 12-02-2019	Revision – Date Approved: 12-02-2019
Approved by: NAHAC Board of Directors	
<p>PURPOSE:</p> <p>Contract and agreement administration and monitoring aims to minimize the risk to NAHAC and ensure compliance with all Federal and State requirements.</p> <p>Contracts are used to record relationships where NAHAC wishes to enter into an enforceable binding agreement. Memorandums of Understanding (MOU) are generally used to record relationships where NAHAC does not wish to be legally bound to another party, but simply intends to express a convergence of will between the parties involved; however, an MOU may contain legally enforceable content as deemed necessary.</p> <p>POLICY:</p> <p>Due to their nature, each individual contract or agreement will vary depending on the terms and conditions desired and agreed upon by all parties involved. All significant terms, conditions, and other relevant details should be documented and agreed to by each party. Such documentation may be accomplished through Statements of Work (SOW), Service Level Agreements (SLA), or other similar documentation. All contracts and agreements or accompanying documentation should be clear, concise, performance-based and in the best interest of NAHAC in achieving its mission and vision. Procedures for administration should be described in the respective contracts or agreements and the responsibilities of each party outlined with a goal of ensuring satisfactory performance by all parties.</p> <p>NAHAC’s Board of Directors or Management will approve all contracts or agreements with external parties upon prior review by NAHAC’s legal counsel, in accordance with procurement policy. NAHAC Management will be responsible for negotiating and preparing all contracts or agreements to be approved in accordance with procurement policy, and for oversight of such contracts or agreements to ensure appropriate progress and performance. This includes appropriate recordkeeping, ensuring fair practices, preventing conflicts of interest, and ensuring compliance with all applicable laws and regulations.</p>	

RECORD RETENTION AND DESTRUCTION

Policy Area: Administration	Number: 200.E
Initial Effective Date: 12-19-2013	Initial Approved Date: 12-19-2013
Revised Policy Effective Date: 12-02-2019	Revision – Date Approved: 12-02-2019
Approved by: NAHAC Board of Directors	
<p>PURPOSE:</p> <p>The purpose of this Policy includes (a) retention and maintenance of documents necessary for the proper functioning of the organization as well as to comply with applicable laws and regulations; (b) destruction of documents which no longer need to be retained; and (c) guidance for the Board of Directors, Officers, employees and other constituencies with respect to their responsibilities concerning document retention and destruction.</p> <p>POLICY:</p> <p>NAHAC, with respect to the retention and destruction of documents and other records, will adhere to all federal and State of Nevada requirements for both hard copy and electronic media (which may merely be referred to as “documents” in this Policy). NAHAC Management will also ensure, as it relates to the “Commitment to Purchase Financial Instrument and HFA Participation Agreement” “Unless otherwise directed by Treasury.....shall retain these records for at least three (3) years from the End of the Term, or for such longer period as may be required pursuant to Applicable Laws”, that procedures will exist to guarantee this requirement is met.</p> <p><u><i>Responsibilities of Management</i></u></p> <p>As directed by the Board of Directors, NAHAC’s Executive Director or equivalent management official (Director), shall enforce the administration of this policy with responsibilities including, at a minimum, supervising and coordinating the retention and destruction of documents pursuant to this Policy and particularly the Document Retention Schedule included below. The Director shall also be responsible for documenting the actions taken to maintain and/or destroy organization documents and retaining such documentation. The Director may modify the Document Retention Schedule from time to time as necessary to comply with law and/or to include additional or revised document categories as may be appropriate to reflect organizational policies and procedures. The Director may appoint or delegate certain tasks in carrying out these responsibilities; however, ultimate responsibility for administration of this policy is retained by the Director. The Director shall communicate this policy to all relevant third parties.</p> <p><u><i>Responsibilities of Constituencies</i></u></p> <p>This Policy also relates to the responsibilities of Board members, employees, and third parties with respect to maintaining and documenting the storage and destruction of the organization’s documents. Employees of the organization shall be familiar with this policy, act in accordance therewith, and assist the Director, as requested.</p>	

Responsibilities of Constituencies (Continued):

The responsibility of authorized third parties with respect to this policy shall be to produce specifically identified documents upon the request of management, if the authorized third party still retains such documents. In that regard, after each project in which an authorized third party has been involved, or each term which the authorized third party has served, it shall be the responsibility of the Director to confirm whatever types of documents the authorized third party retained and to request any such documents which the Director feels will be necessary for retention by the organization (not by the authorized third party). In particular circumstances, the Director may require that the contract with the authorized third party specify the particular responsibilities with respect to this policy.

Suspension of Document Destruction; Compliance

The organization becomes subject to a duty to preserve (or halt the destruction of) documents once litigation, an audit or a government investigation is reasonably anticipated. Further, federal law imposes criminal liability (with fines and/or imprisonment for not more than 20 years) upon whomever “knowingly alters, destroys, mutilates, conceals, covers up, falsifies, or makes a false entry in any record, document, or tangible object with the intent to impede, obstruct, or influence the investigation or proper administration of any matter within the jurisdiction of any department or agency of the United States ... or in relation to or contemplation of any such matter or case.” Therefore, if the Director becomes aware that litigation, a governmental audit or a government investigation has been instituted, or is reasonably anticipated or contemplated, the Director shall immediately order a halt to all document destruction under this Policy, communicating the order to all affected constituencies in writing. The Director may thereafter amend or rescind the order only after conferring with legal counsel. If any member of NAHAC’s Board of Directors or any NAHAC employee becomes aware that litigation, a governmental audit or a government investigation has been instituted, or is reasonably anticipated or contemplated, with respect to the organization, and they are not sure whether the Director is aware of it, they shall make the Director aware of it. Failure to comply with this policy, especially including disobeying any destruction halt order, could result in possible civil or criminal sanctions. In addition, for employees, it could lead to disciplinary action including possible termination.

Electronic Documents; Document Integrity

Documents in electronic format shall be maintained just as hard copy or paper documents are, in accordance with the Document Retention Schedule. Due to the fact that the integrity of electronic documents, whether with respect to the ease of alteration or deletion, or otherwise, may come into question, the Director shall attempt to establish standards for document integrity, including guidelines for handling electronic files, backup procedures, archiving of documents, and regular checkups of the reliability of the system; provided, that such standards shall only be implemented to the extent that they are reasonably attainable considering the resources and other priorities of the organization.

Privacy

It shall be the responsibility of the Director, after consultation with counsel, to determine how privacy laws will apply to the organization’s documents from and with respect to employees and other constituencies; to establish reasonable procedures for compliance with such privacy laws; and to allow for their audit and review on a regular basis.



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Emergency Planning

Documents shall be stored in a safe and accessible manner. Documents which are necessary for the continued operation of the organization in the case of an emergency shall be regularly duplicated or backed up and maintained in an off-site location. The Director shall develop reasonable procedures for document retention in the case of an emergency.

Document Creation and Generation

The Director shall discuss with employees the ways in which documents are created or generated. With respect to each employee or organizational function, the Director shall attempt to determine whether documents are created which can be easily segregated from others, so that, when it comes time to destroy (or retain) those documents, they can be easily culled from the others for disposition. For example, on an employee-by-employee basis, are e-mails and other documents of a significantly non-sensitive nature so that they might be deleted, even in the face of a litigation hold with respect to other, more sensitive, documents? This dialogue may help in achieving a major purpose of the policy – to conserve resources – by identifying document streams in a way that will allow the policy to routinely provide for destruction of documents. Ideally, the organization will create and archive documents in a way that can readily identify and destroy documents with similar expirations.

DOCUMENT RETENTION SCHEDULE:

Document Type	Retention Period
Accounting and Finance	
Accounts Payable	7 years
Accounts Receivable	7 years
Annual Financial Statements and Audit Reports	Permanent
Bank Statements, Reconciliations & Deposit Slips	7 years
Canceled Checks – routine	7 years
Canceled Checks – special, such as loan repayment	Permanent
Credit Card Receipts	3 years
Employee/Business Expense Reports/Documents	7 years
General Ledger	Permanent
Interim Financial Statements	7 years
Contributions/Gifts/Grants	
Contribution Records	Permanent
Grant Records	7 yrs. after end of grant period
Corporate and Exemption	
Articles of Incorporation and Amendments	Permanent
Bylaws and Amendments	Permanent
Minute Books, including Board & Committee Minutes	Permanent
Annual Reports to Attorney General & Secretary of State	Permanent
Other Corporate Filings	Permanent
IRS Exemption Application (Form 1023 or 1024)	Permanent
IRS Exemption Determination Letter	Permanent

DOCUMENT RETENTION SCHEDULE (CONTINUED):

Corporate and Exemption (Continued)

State Exemption Application (if applicable)	Permanent
State Exemption Determination Letter (if applicable)	Permanent
Licenses and Permits	Permanent
Employer Identification (EIN) Designation	Permanent

Correspondence and Internal Memoranda

Hard copy correspondence and internal memoranda relating to a particular document otherwise addressed in this Schedule should be retained for the same period as the document to which they relate.

Hard copy correspondence and internal memoranda relating to routine matters with no lasting significance	Two Years
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Correspondence and internal memoranda important to the organization or having lasting significance	Permanent, subject to review
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Electronic Mail (E-mail) to or from the organization

Electronic mail (e-mail) relating to a particular document otherwise addressed in this Schedule should be retained for the same period as the document to which they relate, but may be retained in hard copy form with the document to which they relate.

E-mails considered important to the organization or of lasting significance should be printed and stored in a central repository.	Permanent, subject to review
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E-mails not included in either of the above categories	12 months
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Electronically Stored Documents

Electronically stored documents (e.g., in pdf, text or other electronic format) comprising or relating to a particular document otherwise addressed in this Schedule should be retained for the same period as the document which they comprise or to which they relate, but may be retained in hard copy form (unless the electronic aspect is of significance).

Electronically stored documents considered important to the organization or of lasting significance should be printed and stored in a central repository (unless the electronic aspect is of significance).	Permanent, subject to review
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Electronically stored documents not included in either of the above categories	Two years
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DOCUMENT RETENTION SCHEDULE (CONTINUED):

Employment, Personnel and Pension

Personnel Records	10 yrs. after employment ends
Employee contracts	10 yrs. after termination

Insurance

Property, D&O, Workers' Compensation and General Liability Insurance Policies	Permanent
Insurance Claims Records	Permanent

Legal and Contracts

Contracts, related correspondence and other supporting documentation	10 yrs. after termination
Legal correspondence	Permanent

Management and Miscellaneous

Strategic Plans	7 years after expiration
Disaster Recovery Plan	7 years after replacement
Policies and Procedures Manual	Current version with revision history

Property – Real, Personal and Intellectual

Property deeds and purchase/sale agreements	Permanent
Property Tax	Permanent
Real Property Leases	Permanent
Personal Property Leases	10 years after termination
Trademarks, Copyrights and Patents	Permanent

Tax

Tax exemption documents & correspondence	Permanent
IRS Rulings	Permanent
Annual information returns – federal & state	Permanent
Tax returns	Permanent



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TAX COMPLIANCE

Policy Area: Administration	Number: 200.F
Initial Effective Date: 12-19-2013 Revised Policy Effective Date: 01-27-2021	Initial Approved Date: 12-19-2013 Revision – Date Approved: 01-27-2021
Approved by: NAHAC Board of Directors	
<p>PURPOSE:</p> <p>NAHAC is regulated for tax purposes by the Internal Revenue Service as a 501(c)(3) not-for-profit organization. Accordingly, this policy is intended to address tax reporting and compliance requirements of the organization.</p> <p>POLICY:</p> <p>NAHAC will maintain compliance with tax related laws and regulations by preparing and filing all tax forms on or before their required due dates. Federal Form 990 will be reviewed and approved by the Executive Director or equivalent management official (Director) and the Board Chairman and Board Treasurer prior to filing. Payroll related tax reporting will be completed and filed by a qualified third-party provider. All other tax reporting requirements will be reviewed and approved by the Director prior to filing. No actions shall be taken by the Board of Directors, Management, or employees of NAHAC that would jeopardize the organization's status as a 501(c)(3) not-for-profit reporting entity.</p>	

INTERNAL CONTROLS

Policy Area: Administration	Number: 200.G
Initial Effective Date: 12-19-2013	Initial Approved Date: 12-19-2013
Revised Policy Effective Date: 12-02-2019	Revision – Date Approved: 12-02-2019
Approved by: NAHAC Board of Directors	
<p>PURPOSE:</p> <p>NAHAC’s Management is responsible for maintaining a system of internal controls and communicating the expectations and duties as a part of the control environment. The system of internal controls should be established based on objectives set forth to address risks identified by NAHAC’s Management. A well-designed internal control system will safeguard assets of the organization, ensure the reliability and integrity of reporting, ensure compliance with laws; regulations; and contracts, promote efficient and effective operations, and aim to accomplish the organizations mission and vision. In addition, the original “Commitment to Purchase Financial Instrument and HFA Participation Agreement” (HPA) between the U.S. Treasury (Treasury) and the State of Nevada’s Housing Division (specific to NAHAC and its accompanying programs), requires that NAHAC have an internal control program (ICP) in place and that an effective ICP be implemented. As it relates to the HPA, the primary purpose of the written ICP is to assure Treasury that a well-functioning system is in place that enables the requirements stipulated in the HPA (and all current and future amendments) to be complied with including fraud awareness, training, detection, mitigation, and prevention of fraud or errors. The ICP also must be written in a way that testing, documentation and reporting mechanisms are in place to test for system effectiveness and operational efficiency on a periodic basis.</p> <p>POLICY:</p> <p>NAHAC will ensure that an effective ICP is written, reviewed, and maintained on a timely basis by qualified personnel or third-party providers to not only satisfy the requirements imposed by Treasury (via the HPA), but also to ensure that the organization itself is operating in an effective and efficient manner. NAHAC’s management will determine objectives of internal controls to address identified risks and establish control activities aimed to meet those objectives. Additionally, the ICP will includes regular testing of NAHAC’s activities to determine the effectiveness of internal controls and operating procedures. This testing will be performed at least quarterly, and include both administrative and program related expenses, program eligibility, compliance requirements, and any other pertinent tests. NAHAC will also establish separate policies related to relevant internal control areas including, but not limited to, segregation of duties, travel, procurement, cash receipts and disbursements, financial reporting, budgeting, etc.</p> <p>RESOURCES:</p> <p>See Appendix IV - Internal Control Program.</p>	



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PROGRAM COMPLIANCE

Policy Area: Program	Number: 300.A
Initial Effective Date: 12-19-2013	Initial Approved Date: 12-19-2013
Revised Policy Effective Date: 01-27-2021	Revision – Date Approved: 01-27-2021
Approved by: NAHAC Board of Directors	
<p>PURPOSE:</p> <p>NAHAC may obtain funding from various sources including individuals, companies, or governmental agencies. This policy aims to ensure that these funds are used to provide assistance to eligible Nevada homeowners, and comply with the terms of any applicable contracts or agreements. The primary program of the organization is the administration of the Hardest Hit Funds (HHF) program which is regulated by the U.S. Department of the Treasury as outlined in the “Commitment to Purchase Financial Instrument and HFA Participation Agreement” (HFA Agreement), including any amendments thereto.</p> <p>POLICY:</p> <p>All programs administered by NAHAC should be adequately documented and appropriate to accomplish the mission and vision of the organization. Such documentation for the HHF program should include underwriting guidelines, or equivalent documentation, to ensure compliance with the terms of the HFA agreement, as amended; and to provide for the efficient and effective administration of the program. These guidelines should be designed to prevent and detect errors and/or fraud in providing assistance to only qualified Nevada homeowners. In addition, these guidelines, along with any related procedures, should be reviewed by NAHAC Management at least annually to ensure that the objectives of those guidelines are still being met, including the terms and conditions set forth in the HFA agreement. If quality control procedures performed by NAHAC determine that changes to these guidelines or related procedures should be made, such changes should be completed in a timely manner. All required program related reporting shall be made in a timely manner as required by contract, agreement, laws, or other regulations.</p>	



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RED FLAGS

Policy Area: Program	Number: 300.B
Initial Effective Date: 12-19-2013	Initial Approved Date: 12-19-2013
Revised Policy Effective Date: 12-02-2019	Revision – Date Approved: 12-02-2019
Approved by: NAHAC Board of Directors	
<p>PURPOSE:</p> <p>NAHAC Management understands that an important component of an effective anti-fraud environment is employee training. This includes both an awareness of actual fraud risks that can occur due to the nature of NAHAC’s operations, in addition to managing those risks. As such, a listing of possible fraud “red flags” is necessary so that NAHAC Managers and employees may be better equipped to identify high-risk transactions (both internal and external) in a timely manner. However, given that the nature of fraud prevention is ever evolving (e.g. as NAHAC creates procedures to address known fraud risks, fraud perpetrators simply change their method of operating thus necessitating the creation of new procedures), this “red flag” listing will be updated accordingly.</p> <p>POLICY:</p> <p>NAHAC Management will collectively ensure that the Red Flag Guidelines are reviewed and updated regularly, to ensure that all NAHAC employees and relevant third-party providers are cognizant of the most recent, known fraud risks that could impact the monies it is responsible for protecting. In addition, the organization will provide annual training to ensure this policy is adequately communicated.</p> <p>RESOURCES:</p> <p>See Appendix V - Red Flag Guidelines</p>	

PUBLICITY OF HHF PROGRAM

Policy Area: Program	Number: 300.C
Initial Effective Date: 12-19-2013	Initial Approved Date: 12-19-2013
Revised Policy Effective Date: 12-02-2019	Revision – Date Approved: 12-02-2019
Approved by: NAHAC Board of Directors	
<p>PURPOSE:</p> <p>As delineated in Section 10 (Publicity), of the original “Commitment to Purchase Financial Instrument and HFA Participation Agreement,” specific notification and approval procedures are necessary to be followed by NAHAC (and any affiliates, subcontractors or servicers) related to publicity for the Hardest Hit Fund program.</p> <p>POLICY:</p> <p>NAHAC will ensure that proper procedures are implemented and followed as they relate to the publicity requirements set forth in Section 10 in the “Commitment to Purchase Financial Instrument and HFA Participation Agreement”. This includes any communication or outreach strategies, activities, or public messages related to the services provided by the HHF program, whether self-initiated or initiated in response to a request or inquiry from a third party. Any such publicity will be approved by the Executive Director, or equivalent management official, and is subject to review and modification by Treasury.</p>	

SEGREGATION OF DUTIES AND LINES OF AUTHORITY

Policy Area: Finance	Number: 400.A
Initial Effective Date: 12-19-2013 Revised Policy Effective Date: 01-27-2021	Initial Approved Date: 12-19-2013 Revision – Date Approved: 01-27-2021
Approved by: NAHAC Board of Directors	
<p>PURPOSE:</p> <p>To ensure adequate segregations of duties are in place to reduce errors (intentional or unintentional) and to ensure such errors do not remain undetected, by providing for separate processing by different individuals at various stages of a transaction and for independent reviews of the work performed. The segregation of duties provides four primary benefits: 1) the risk of a deliberate fraud is mitigated as the collusion of two or more persons would be required in order to circumvent controls; 2) the risk of legitimate errors is mitigated as the likelihood of detection is increased; 3) the cost of corrective actions is mitigated as errors are generally detected relatively earlier in their lifecycle; and 4) the organization’s reputation for integrity and quality is enhanced through a system of checks and balances.</p> <p>To establish a sound control environment by the Board for the CEO/Executive Director, or equivalent management official, management and employees. A sound control environment exists when everyone’s role and responsibility in the organization are clearly defined to ensure the appropriate, effective and efficient use of the organization’s funds.</p> <p>POLICY:</p> <p>An appropriate segregation of duties shall be maintained in accordance with the principles set forth in this document and NAHAC’s Internal Control Program. The company shall identify, remediate, and maintain a separation of incompatible business functions. In permissible instances where business functions cannot be fully and appropriately segregated due to specific circumstances, NAHAC Management shall implement mitigating controls to compensate for such situations. As changes occur in the organizational, functional, and technological environments, assessments shall be performed to address the impact on the segregation of duties resulting from such changes. NAHAC Management shall review, revise, and enforce this policy as significant developments occur with respect to the segregation of duties.</p> <p>In maintaining a segregation of duties, NAHAC employs several safeguards to ensure that activities and transactions are properly authorized, appropriated, executed and recorded by establishing an Authorization Matrix, which must be approved by NAHAC’s Board of Directors.</p> <p>RESOURCES:</p> <p>See Appendix IV – Internal Control Program See Appendix VI – Authorization Matrix – Finance See Appendix VII – Authorization Matrix – Payroll and HR</p>	



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PHYSICAL SECURITY

Policy Area: Finance	Number: 400.B
Initial Effective Date: 12-19-2013	Initial Approved Date: 12-19-2013
Revised Policy Effective Date: 12-02-2019	Revision – Date Approved: 12-02-2019
Approved by: NAHAC Board of Directors	
<p>PURPOSE:</p> <p>To ensure that physical security of all assets both physical and indirect is properly controlled.</p> <p>POLICY:</p> <p>NAHAC shall maintain physical security of its assets to ensure that only people who are authorized have physical or indirect access to money, securities, real estate or other valuable property.</p>	



NEVADA AFFORDABLE HOUSING ASSISTANCE CORPORATION

BASIS OF ACCOUNTING

Policy Area: Finance	Number: 400.C
Initial Effective Date: 12-19-2013	Initial Approved Date: 12-19-2013
Revised Policy Effective Date: 12-02-2019	Revision – Date Approved: 12-02-2019
Approved by: NAHAC Board of Directors	
<p>PURPOSE:</p> <p>The Governmental Accounting Standards Board (“GASB”) is the accepted standard-setting body for establishing governmental accounting and financial reporting principles. GASB Statement No. 20 requires NAHAC to apply all applicable GASB pronouncements, unless they conflict with or contradict GASB pronouncements or Financial Accounting Standards Board (FASB) Statements and Interpretations. NAHAC is also subject to Title 2 CFR 200 “Uniform Administrative Requirements, Cost Principles and Audit Requirements for Federal Awards”.</p> <p>POLICY:</p> <p>NAHAC shall conform to Generally Accepted Accounting Principles (GAAP) as applied to governmental units on the accrual basis of accounting. The accrual basis is the method of accounting whereby revenue and expenses are identified with specific periods of time, such as month or year and are recorded as incurred. The method of recording revenue and expenses is without regard to date of receipt or payment of cash.</p>	



NEVADA AFFORDABLE HOUSING ASSISTANCE CORPORATION

MONTH-END CLOSE AND JOURNAL ENTRIES

Policy Area: Finance	Number: 400.D
Initial Effective Date: 12-19-2013	Initial Approved Date: 12-19-2013
Revised Policy Effective Date: 12-02-2019	Revision – Date Approved: 12-02-2019
Approved by: NAHAC Board of Directors	
<p>PURPOSE:</p> <p>In order to provide the Organization and Board of Directors with timely accurate information, and to ensure journal entries entered into the accounting system are both appropriate and authorized.</p> <p>POLICY:</p> <p>The Executive Director, or equivalent management official, shall designate an individual within the accounting department to be responsible for maintaining the books of the organization, including the monthly financial close process. The monthly financial close process will typically be performed within approximately 10 days after month-end, but always prior to the end of the following month. Invoices received after the month has been closed shall generally be recorded in the month received, except for at year-end. All balance sheet accounts will be reconciled by the 20th day of the following month, or within 20 days from the receipt of an account statement in the case of credit card accounts. A checklist shall be used each month to ensure that all month-end close procedures have been completed.</p> <p>General journal entries are made when necessary to record transactions to the appropriate period and account classification. Such entries should be limited to those individuals with management responsibility over the accounting and financial reporting functions and will include a detailed description of the purpose for the entries and relevant supporting documentation. All journal entries will include a detailed description of why the entry is being made, along with supporting documentation.</p>	



NEVADA AFFORDABLE HOUSING ASSISTANCE CORPORATION

BANK RECONCILIATIONS

Policy Area: Finance	Number: 400.E
Initial Effective Date: 12-19-2013 Revised Policy Effective Date: 01-27-2021	Initial Approved Date: 12-19-2013 Revision – Date Approved: 01-27-2021
Approved by: NAHAC Board of Directors	
<p>PURPOSE:</p> <p>NAHAC believes the reconciliation of all bank accounts in a timely manner is imperative. This policy serves to identify who and when those reconciliations must be completed.</p> <p>POLICY:</p> <p>All bank statements will be opened and reviewed in a timely manner. Bank reconciliations will be performed within 20 days of month-end and reviewed within 30 days from the end of the previous month. Any old outstanding items should be minimal and followed-up on as soon as possible.</p>	



NEVADA AFFORDABLE HOUSING ASSISTANCE CORPORATION

COST ALLOCATIONS FOR SHARED RESOURCES

Policy Area: Finance	Number: 400.F
Initial Effective Date: 12-19-2013 Revised Policy Effective Date: 12-02-2019	Initial Approved Date: 12-19-2013 Revision – Date Approved: 12-02-2019
Approved by: NAHAC Board of Directors	
<p>PURPOSE:</p> <p>The Board of Directors recognizes that as the organization grows and evolves, other related programs may be created in order to further its mission to provide, funds, subsidies, and/or other benefits to high-risk, eligible Nevada homeowners and other targeted groups of individuals within the State of Nevada. In providing these resources, certain expenses will be incurred that need to be allocated to the programs to which they relate, including a proportionate allocation of indirect costs.</p> <p>POLICY:</p> <p>All direct costs incurred by the organization will be allocated to the program to which they relate. For shared costs or resources, including allowable indirect costs, an allocation should be made based on a relevant and appropriate basis. This might include time spent by employee, square footage of space used, or another similar basis.</p>	



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BUDGETING

Policy Area: Finance	Number: 400.G
Initial Effective Date: 12-19-2013	Initial Approved Date: 12-19-2013
Revised Policy Effective Date: 12-02-2019	Revision – Date Approved: 12-02-2019
Approved by: NAHAC Board of Directors	
<p>PURPOSE:</p> <p>To outline the budget process in a coordinated effort to support the goals and objectives that are set by the Board of Directors.</p> <p>POLICY:</p> <p>The Executive Director, or equivalent management official, acts as the coordinator of the budgeting process with the assistance of other designated management personnel. A financial budget should be prepared and approved by the Board of Directors at least annually, prior to the start of the fiscal year. The budget should include estimated revenues and expenses for the fiscal year and should be formatted to follow Schedule C of the HPA agreement for administrative expenses. The budget is revised during the year only if approved by the Board of Directors. The budget should be compared with actual results and presented to the Board of Directors on a monthly basis.</p>	

FINANCIAL REPORTING

Policy Area: Finance	Number: 400.H
Initial Effective Date: 12-19-2013	Initial Approved Date: 12-19-2013
Revised Policy Effective Date: 12-02-2019	Revision – Date Approved: 12-02-2019
Approved by: NAHAC Board of Directors	
<p>PURPOSE:</p> <p>In order to increase the likelihood that the Board of Directors has every opportunity to fulfil its duties it is imperative that Management provide concise, relevant, and timely information in a direct, straightforward way prior to each scheduled board meeting.</p> <p>POLICY:</p> <p>The Executive Director, or equivalent management official, will ensure that financial reports are prepared showing budgeted versus actual results of operations and administration, forecasted activity for the fiscal year, and/or other information as requested by the Board of Directors. Such information shall be provided to the Board of Directors on a monthly basis, not later than 30 days after the close of the prior month, and be presented at the next scheduled board meeting by a knowledgeable management official or their delegate.</p> <p>In addition, all required program related financial reports, including those required by the US Department of the Treasury, shall be provided in a timely manner, as directed.</p>	



NEVADA AFFORDABLE HOUSING ASSISTANCE CORPORATION

INDEPENDENT AUDIT

Policy Area: Finance	Number: 400.I
Initial Effective Date: 12-19-2013 Revised Policy Effective Date: 01-27-2021	Initial Approved Date: 12-19-2013 Revision – Date Approved: 01-27-2021
Approved by: NAHAC Board of Directors	
<p>PURPOSE:</p> <p>An audit is a series of procedures followed by an outside experienced professional accountant to test, on a selective basis, transactions and internal controls in effect, all with a view to forming an opinion of the fairness of the presentation of the financial statements of the organization.</p> <p>POLICY:</p> <p>NAHAC shall engage an independent auditor to prepare audited financial statements annually following the close of the fiscal year at June 30th. Annual audited financial statements are to be completed no later than (120) days after the end of the fiscal year and are due to the US Department of the Treasury no later than (180) days after the end of the fiscal year along with an agreed-upon procedure report on the Internal Control Program of the organization, in accordance with the HPA agreement. The audited financial statements should also be posted to NAHAC's website within 30 days after completion.</p>	



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REVENUE RECOGNITION

Policy Area: Finance	Number: 400.J
Initial Effective Date: 12-19-2013	Initial Approved Date: 12-19-2013
Revised Policy Effective Date: 12-02-2019	Revision – Date Approved: 12-02-2019
Approved by: NAHAC Board of Directors	
<p>PURPOSE:</p> <p>To provide clear, consistent guidance to individuals conducting activities and receiving payments on NAHAC’s behalf, the following guidelines are provided to assist in the determination of whether a transaction creates revenue for NAHAC under Generally Accepted Accounting Principles (GAAP).</p> <p>POLICY:</p> <p>All revenue will be recorded in accordance with GAAP. Grant revenue (as it relates to HHF) will be recognized when corresponding expenditures are incurred and recorded. Interest income will be recognized when earned.</p>	



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INVOICE PREPARATION

Policy Area: Finance	Number: 400.K
Initial Effective Date: 12-19-2013	Initial Approved Date: 12-19-2013
Revised Policy Effective Date: 12-02-2019	Revision – Date Approved: 12-02-2019
Approved by: NAHAC Board of Directors	
<p>PURPOSE:</p> <p>In order for NAHAC to ensure a regular healthy cash flow for the organization it is necessary to outline when and how all invoices are prepared.</p> <p>POLICY:</p> <p>NAHAC will invoice all grants, projects including servicer invoices when final approval has been received. All final invoices for the prior month are completed by the 15th of the following month.</p>	



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CASH RECEIPTS

Policy Area: Finance	Number: 400.L
Initial Effective Date: 12-19-2013	Initial Approved Date: 12-19-2013
Revised Policy Effective Date: 12-02-2019	Revision – Date Approved: 12-02-2019
Approved by: NAHAC Board of Directors	
<p>PURPOSE:</p> <p>To ensure that controls are established over all forms of payments, that payments are deposited promptly into NAHAC bank accounts, and that receipts are protected from misappropriations.</p> <p>POLICY:</p> <p>NAHAC will manage all receipt transactions in a clear, accurate, timely, and efficient manner. Funds received in the mail shall include an appropriate segregation of duties or compensating control. Appropriate documentation shall be maintained for any and all deposits or receipts. NAHAC shall not accept cash on any regular basis. Bank deposits shall be scanned and remotely deposited whenever possible.</p>	

CASH DISBURSEMENTS

Policy Area: Finance	Number: 400.M
Initial Effective Date: 12-19-2013	Initial Approved Date: 12-19-2013
Revised Policy Effective Date: 12-02-2019	Revision – Date Approved: 12-02-2019
Approved by: NAHAC Board of Directors	
<p>PURPOSE:</p> <p>To provide general guidance on formulating cash disbursement policies and procedures. Cash disbursement policies and procedures should ensure that cash is disbursed only for valid business purposes after approvals by authorized persons and in compliance with applicable donor, sponsor or regulatory requirements.</p> <p>POLICY:</p> <p>Cash disbursements include all forms of disbursement, including but not limited to: checks, wires, ACH transactions, etc. All vendor, supplier, consultant and contractor invoices shall be routed to the accounting department for processing. Personnel with responsibility over accounts payable shall process the invoices in a timely fashion and in accordance with the terms and conditions of the purchase agreements. All invoices must be matched to the proper supporting documentation and must be approved by authorized personnel acting within the scope of their authority (see Authorization Matrix). Approved invoices shall be paid within 30 days of receipt. Check requests are required when no invoice is available per contract. All electronic fund wires shall be initiated and authorized by separate individuals.</p> <p>Work orders are required for all purchases of services, including appropriate authorization, prior to securing services. Purchase orders are required for all purchases of goods, including appropriate authorization, prior to purchase. In lieu of the above forms, a check request form may be used so long as adequate approvals and documentation is included.</p> <p>RESOURCES:</p> <p>See Appendix VI – Authorization Matrix – Finance See Appendix VII – Authorization Matrix –Payroll and HR</p>	



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PURCHASING AND PROCUREMENT

Policy Area: Finance	Number: 400.N
Initial Effective Date: 12-19-2013 Revised Policy Effective Date: 12-02-2019	Initial Approved Date: 12-19-2013 Revision – Date Approved: 12-02-2019
Approved by: NAHAC Board of Directors	
<p>PURPOSE:</p> <p>To ensure that goods and services are obtained in an efficient, effective manner in accordance with all applicable state and federal requirements.</p> <p>POLICY:</p> <p>NAHAC will obtain goods and services in an efficient, effective manner in accordance with all applicable state, federal or grant requirements.</p> <p>Any expenditure in excess of \$25,000 for the purchase of goods or services should have bids from three (3) suppliers, if possible. These bids will be reviewed by the CEO/Executive Director or equivalent management official, and the bid award must be specifically approved by the Board of Directors. If obtaining proposals or bids is not practical or reasonable due to timing, specialization, or another relevant purpose, the Board of Directors may approve a deviation from this policy as long as such a decision follows applicable laws, regulations, contracts, or other terms and agreements to which the organization is subject.</p> <p>When necessary and approved by the Board of Directors, independent contractors may be utilized in lieu of hiring individuals for specialized projects, for a high level of expertise, or when resulting in cost savings compared to the alternative.</p> <p>RESOURCES:</p> <p>See Appendix VI – Authorization Matrix - Finance</p>	



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PETTY CASH

Policy Area: Finance	Number: 400.O
Initial Effective Date: 12-19-2013	Initial Approved Date: 12-19-2013
Revised Policy Effective Date: 12-02-2019	Revision – Date Approved: 12-02-2019
Approved by: NAHAC Board of Directors	
<p>PURPOSE:</p> <p>The purpose of a Petty Cash Fund is to facilitate small business purchases or reimbursements needed in the day-to-day operations of the organization, without going through the check writing process.</p> <p>POLICY:</p> <p>The Board of Directors has chosen not to allow any Petty Cash Funds to be established or maintained by NAHAC Management.</p>	

TRAVEL

Policy Area: Finance	Number: 400.P
Initial Effective Date: 12-19-2013	Initial Approved Date: 12-19-2013
Revised Policy Effective Date: 12-02-2019	Revision – Date Approved: 12-02-2019
Approved by: NAHAC Board of Directors	
<p>PURPOSE:</p> <p>NAHAC will reimburse employees for reasonable and necessary expenses incurred in connection with approved travel on behalf of the company. NAHAC strongly encourages use of travel discounts when making travel arrangements.</p> <p>Travelers seeking reimbursement should incur the lowest reasonable travel expenses and exercise care to avoid impropriety, or the appearance of impropriety. Reimbursement is allowed only when reimbursement has not been, and will not be, received from other sources. If a circumstance arises that is not specifically covered in this travel policy, then the most conservative course of action should be taken.</p> <p>Business travel policies are aligned with company reimbursement rules. All business-related travel paid with NAHAC funds must comply with company disbursement and procurement policies.</p> <p>POLICY:</p> <p>Employee travel must be authorized. Travelers should verify that planned travel is eligible for reimbursement before making travel arrangements. Within 30 days of completion of a trip, the traveler must submit a Travel Reimbursement form and supporting documentation to obtain reimbursement of expenses.</p> <p>An individual may not approve his or her own travel or reimbursement. Travel reimbursements under \$1,000 must be approved by the Executive Director or equivalent management official, or their designee. Travel reimbursements over \$1,000 or reimbursed to the Executive Director or equivalent management official must be approved by a member of the Board of Directors. Designated approval authorities are required to review expenditures and withhold reimbursement if there is a reason to believe that the expenditures are inappropriate or extravagant.</p> <p>DETAILS:</p> <p><i>Personal funds</i></p> <p>Travelers should review reimbursement guidelines before spending personal funds for business travel to determine if such expenses are reimbursable. NAHAC reserves the right to deny reimbursement of travel-related expenses for failure to comply with policies and procedures.</p>	



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Travelers who use personal funds to facilitate travel arrangements will not be reimbursed until after the trip occurs and proper documentation is submitted.

Vacation in conjunction with business travel

In cases in which vacation time is added to a business trip, any cost variance in airfare, car rental or lodging must be clearly identified on the Travel Request form. NAHAC will not prepay any personal expenses with the intention of being “repaid” at a later time, nor will any personal expenses be reimbursed.

Exceptions

Occasionally it may be necessary for traveler to request exceptions to this travel policy. Requests for exceptions to the policy must be made in writing and approved by the Executive Director or equivalent management official or their designee. Exceptions related to the Executive Director’s expenses must be submitted to the Board Chairperson for approval. In most instances, the expected turnaround time for review and approval is five business days.

Travel Expenses/Procedures

General information

Authorized business travel for employees that includes prepayments must be pre-approved.

Reimbursement of parking, mileage, and ferry or bus passes do not require requests if they are under \$10; however, they would follow other NAHAC policies and procedures related to reimbursements or check requests. Requests for reimbursement of travel expenses are to be submitted on a Travel Reimbursement form.

Permissible prepaid travel expenses

Before the travel, NAHAC may issue prepayments for airfare, rail transportation, rental vehicles, conference registration fees and cash advances. Applicable policies and methods of payments for these prepayments follow.

Airfare. Travelers are expected to obtain the lowest available airfare that reasonably meets business travel needs. Airfare may be prepaid by NAHAC.

Travelers are encouraged to book flights at least 30 days in advance to avoid premium airfare pricing. First-class tickets are not reimbursable.

Coach/economy class tickets, or its equivalent, must be purchased for domestic or international flights (defined as flight time totaling less than five consecutive hours excluding layovers). A higher-priced coach ticket cannot be purchased for a subsequent upgrade in seating.

A less-than-first-class ticket (i.e., business class) may be purchased at NAHAC’s discretion for domestic or international flights (defined as flight time exceeding five consecutive hours excluding layovers).

Rail transportation. NAHAC will prepay rail transportation provided that the cost does not exceed the cost of the least expensive airfare.

Rental vehicles. NAHAC will pay for approved use of a rental vehicle. See the section on reimbursements below in this section.

Conference registration fees. Conference registration fees can be prepaid with a credit card or check from NAHAC. Business-related banquets or meals that are considered part of the conference can be paid with the registration fees; however, such meals must be deducted from the traveler's per diem allowance. See Meals (per diem) for more detail.

Travel advances. Cash advances are authorized for specific situations that might cause undue financial hardship for business travelers. These situations are limited to employees traveling on behalf of NAHAC. A maximum of 80 percent of the total estimated cost can be advanced.

Expenses associated with the travel must be reconciled and substantiated within 30 days of the return date. The traveler must repay NAHAC for any advances in excess of the approved reimbursable expenses. The department initiating the travel is responsible for notifying the accounting department to deposit any excess funds into the appropriate departmental account.

Travel advances are processed by submitting completed request forms to NAHAC. Reimbursement for any remaining expenses is processed on a form approved by the designated approval authority.

Reimbursements

Requests for reimbursements of travel-related expenses are submitted on a completed form. This form must be accompanied by supporting documentation. If the requested reimbursement exceeds 20 percent of the total pre-trip estimate, the form must be signed by the Executive Director or equivalent management official, or their designee.

These forms must be submitted to the accounting department within 30 days after the trip is completed. Travel reimbursement forms not submitted within this time frame requires exception approval from the Executive Director or equivalent management official, or their designee.

Reimbursement of travel expenses is based on documentation of reasonable and actual expenses supported by the original, itemized receipts. Reimbursements that may be paid by NAHAC are shown below.

Airfare. If the airfare was not prepaid by NAHAC, an original itemized airline receipt, an e-ticket receipt/statement or an Internet receipt/statement is required. The receipt must show the method of payment and indicate that payment was made. An email with the appropriate information is also acceptable.

Travelers are expected to obtain the lowest available airfare that reasonably meets business travel needs. Travelers are encouraged to book flights at least 30 days in advance to avoid premium pricing.

Coach class or economy tickets must be purchased for short duration domestic or international flights (defined as flight time totaling less than five consecutive hours excluding layovers). A higher-priced coach ticket cannot be purchased for a subsequent upgrade in seating.



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A less-than-first-class ticket (i.e., business class) may be purchased at NAHAC's discretion for long duration domestic or international flights (defined as flight time exceeding five consecutive hours excluding layovers).

First-class tickets are not reimbursable.

Rail transportation. NAHAC will pay for rail transportation provided that the cost does not exceed the cost of the least expensive airfare.

If rail transportation was not prepaid by NAHAC, an original itemized receipt, original e-ticket receipt/statement or Internet receipt/statement is required. The receipt must show the method of payment and indicate that payment was made. An email with the appropriate information is also acceptable.

Automobile (personally owned—domestic travel). A valid driver's license issued within the United States and personal automobile insurance are required for expenses to be reimbursed. Drivers should be aware of the extent of coverage (if any) provided by his or her automobile insurance company for travel that is business or not personal in nature.

Reimbursement for use of a personal automobile is based on the Internal Revenue Service's (IRS) standard mileage rates applicable at the time.

In order for NAHAC to maintain appropriate insurance coverage regarding business use of personal vehicles, all employees and independent contractors driving on behalf of NAHAC shall provide a copy of their driver's history report in the jurisdiction where they are licensed.

Automobile (rental—domestic travel). Reimbursement for a commercial rental vehicle as a primary mode of transportation is authorized only if the rental vehicle is more economical than any other type of public transportation, or if the destination is not otherwise accessible. Vehicle rental at a destination city is reimbursable. Original receipts or equivalent documentation are required.

NAHAC authorizes reimbursement for the most economic vehicle available. In certain circumstances larger vehicles may be rented, with approval by the Executive Director, or equivalent management official. The rental agreement must clearly show the date and the points of departure/arrival, as well as the total cost. Drivers must adhere to the rental requirements, and restrictions must be followed. Original receipts or equivalent documentation are required.

When vehicle rentals are necessary, NAHAC encourages travelers to purchase collision damage waiver (CDW) and loss damage waiver (LDW) coverage. NAHAC will reimburse the cost of CDW and LDW coverage; all other insurance reimbursements will be denied.

Drivers should be aware of the extent of a coverage (if any) provided by his or her automobile insurance company for travel that is business or not personal in nature.



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Parking fees, tolls and other incidental costs associated with the vehicle use are not covered by the rental agreement.

Travelers are strongly encouraged to fill the gas tank before returning the vehicle to the rental agency to avoid service fees and more expensive fuel rates. Reasons for deviating from this rule should be documented.

Conference registration fees. If the conference fee was not prepaid, NAHAC will reimburse these fees, including business-related banquets or meals that are part of the conference registration. Original receipts to support the payment are required. If the conference does not provide a receipt, then a cancelled check, credit card slip/statement or documentation that the amount was paid is required for reimbursement.

A prorated amount for the meals provided must be deducted from the traveler's per diem. See Meals (per diem) for more detail. Entertainment activities such as golf outings and sightseeing tours will not be reimbursed.

Registration fees paid directly by an individual will not be reimbursed until the conference is completed.

Lodging (commercial). The cost of overnight lodging (room rate, tax, and resort fee when applicable) will be reimbursed to the traveler if the authorized travel is 45 miles or more from the traveler's home or primary worksite. Exceptions to this restriction may be approved in writing by the Executive Director or equivalent management official or by the Board Chairperson.

NAHAC will reimburse lodging expenses at reasonable, single occupancy or standard business room rates. When the hotel or motel is the conference or convention site, reimbursement will be limited to the conference rates.

Only single room rates are authorized for payment or reimbursement unless the second party is representing the agency in an authorized capacity. If the lodging receipt shows more than a single occupancy, the single room rate must be noted. If reimbursement for more than the single room rate is requested, the name of the second person must be included.

Meals (per diem). Per diem allowances are reimbursable for overnight travel that is 45 miles or more from the traveler's home or primary worksite.

NAHAC per diem rates are paid using U.S. General Services Administration (GSA) per diem rates for the applicable locality. The current rates can be located at the GSA website, as found at www.gsa.gov. Incidental expenses, unless specifically cited in this policy, will not be otherwise reimbursed.

Per diem reimbursements are based on departure and return times over the entire 24-hour day and are prorated accordingly.

If a free meal is served on the plane, included in a conference registration fee, built in to the standard, single hotel room rate or replaced by a legitimate business meal, the per diem allowance for that meal may not be claimed. Deductions for such amounts should use rates found under the “Meals and Incidental Expenses (M&IE) Breakdown” section of the www.gsa.gov website.

Receipts are not required for per diem allowances. Per diem allowances are reimbursed after the trip is completed.

Business expenses. Business expenses, including faxes, photocopies, Internet charges, data ports and business telephone calls incurred while on travel status can be reimbursed. Original itemized receipts are required.

Parking. Original receipts are required for parking fees (including airport parking). The lodging bill can be used as a receipt when charges are included as part of the overnight stay.

Telephone calls. The costs of personal telephone calls are the responsibility of the individual.

Tolls. Original receipts are required for tolls. Toll routes should only be used when necessary, and not just for convenience. Alternate routes without tolls should be used when available and reasonable.

Miscellaneous transportation. Original receipts are required for taxi, bus, subway, metro, ferry and other modes of transportation for each occurrence.

Visa, passport fees and immunizations. If these items are required for international travel, their reimbursement is left to the discretion of the Executive Director or equivalent management official. If approved by the designated authority, original itemized receipts are required.

Non-reimbursable Travel Expenses

The following items that may be associated with business travel will not be reimbursed by NAHAC:

- Airline club memberships.
- Airline upgrades.
- Business class for domestic flights or first class for all flights.
- Child care, babysitting, house-sitting, or pet-sitting/kennel charges.
- Commuting between home and the primary work location.
- Costs incurred by traveler’s failure to cancel travel or hotel reservations in a timely fashion.
- Evening or formal wear expenses.
- Haircuts and personal grooming.
- Laundry and dry cleaning.
- Passports, vaccinations and visas when not required as a specific and necessary condition of the travel assignment.
- Personal entertainment expenses, including in-flight movies, headsets, health club facilities, hotel pay-per-view movies, in-theater movies, social activities and related incidental costs.
- Travel accident insurance premiums or purchase of additional travel insurance.



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- Other expenses not directly related to the business travel.

Travel for Non-Employees

Additional costs for travel, lodging, meal or other travel expenses for spouses or other family members will not be reimbursed unless the individual has a bona fide company purpose for engaging in the travel or attending the event. Such travel is generally limited to senior management and should occur infrequently.



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CELL PHONE REIMBURSEMENT

Policy Area: Finance	Number: 400.Q
Initial Effective Date: 12-19-2013 Revised Policy Effective Date: 04-27-2020	Initial Approved Date: 12-19-2013 Revision – Date Approved: 04-27-2020
Approved by: NAHAC Board of Directors	
<p>PURPOSE:</p> <p>NAHAC will reimburse eligible employees whose job duties include the frequent need for a cell phone to cover business-related costs on their personal cell phone.</p> <p>POLICY:</p> <p>Employees eligible for a cell phone reimbursement include the Executive Director, or equivalent management official, and any other employees where the Executive Director, or equivalent management official, determines that use of the employee's personal cell phone is necessary to enhance the ability of the employee to perform applicable job duties, including employees working under a telework arrangement.</p> <p>The standard bi-weekly reimbursement shall be \$32.50, or as otherwise approved by the board. No further reimbursement for cell phone costs is available to employees who receive a cell phone reimbursement.</p> <p>The approved cell phone allowance will be paid as part of the employee's paycheck and will be non-taxable due to substantial non-compensatory business reasons pursuant to IRS Notice 2011-72. This allowance does not constitute an increase to base pay, and will not be included in the calculation of percentage increases to base pay due to salary increases, promotions, etc.</p> <p>The employee must retain an active cell phone plan as long as a cell phone allowance is in place. The employee must provide the company with their current cell phone number and immediately notify the company if the number changes. Employees receiving a cell phone allowance are expected to carry the cell phone on their person both on and off duty and respond when called for company business. Employees may choose the cellular service provider and plan design of their choice.</p> <p>Because the employee owns the cell phone personally, the employee may use the phone for both business and personal purposes, as needed. Use of the phone in any manner contrary to local, state, or federal laws will constitute misuse, and will result in immediate termination of the cell phone reimbursement. All other policies related to the safeguarding of information and data security should be followed and NAHAC related information should not be saved on the employees' personal devices.</p> <p>If, prior to the end of the cell phone contract, a personal decision by the employee, or employee misconduct, or misuse of the phone, results in the cell phone reimbursement being discontinued or the need to end or change the cell phone contract, the employee will bear the cost of any fees associated</p>	



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with that change or cancellation. For example, if an employee resigns, and no longer wants to retain the current cell phone contract for personal purposes, any cancellation charges will be the employee's responsibility.



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CREDIT CARDS

Policy Area: Finance	Number: 400.R
Initial Effective Date: 12-19-2013	Initial Approved Date: 12-19-2013
Revised Policy Effective Date: 12-02-2019	Revision – Date Approved: 12-02-2019
Approved by: NAHAC Board of Directors	
<p>PURPOSE:</p> <p>To ensure proper procedures and controls are in place for the use of a company credit card. The organization has deemed to provide select Officers/Employees with corporate credit cards for the purpose of conducting NAHAC business.</p> <p>POLICY:</p> <p>All corporate credit cards are the property of the NAHAC, and authorized users shall take the necessary precautions to ensure the safekeeping of the card. Corporate credit cards may not be used for personal expenditures of any kind. No cash advances are allowed. Payments on a corporate credit card account must be made based on an authorized expense report and made by accounts payable. An expense report for credit card purchases must be submitted within 15 days after receipt of the monthly credit card statement. Receipts are required for any expense. Confirmation statements, shipping receipts or similar reports may be used to document telephone orders or fax orders. Any exception shall be explained in writing and signed. Reports will be reviewed for validity and accuracy by the accounting department and the Executive Director, or equivalent management official, prior to being paid. Any employee noting cardholder irregularities (i.e. overdue expense reports or nonbusiness expense) will report the information, in confidence, to the Executive Director or equivalent management official. If the problem is not resolved, he or she should report the irregularities to the Board Chairperson.</p>	



NEVADA AFFORDABLE HOUSING ASSISTANCE CORPORATION

CASH MANAGEMENT AND INVESTMENTS

Policy Area: Finance	Number: 400.S
Initial Effective Date: 12-19-2013	Initial Approved Date: 12-19-2013
Revised Policy Effective Date: 12-02-2019	Revision – Date Approved: 12-02-2019
Approved by: NAHAC Board of Directors	
<p>PURPOSE:</p> <p>The NAHAC Board of Directors anticipates that NAHAC Management will devise and implement techniques and procedures for the receipt, deposit, and disbursement of monies coming into its control and custody which are designed to maximize interest-bearing investment of cash – as well as short and long-term investments – and to minimize idle and non-productive cash balances.</p> <p>POLICY:</p> <p>NAHAC Management will address the receipt, deposit, and disbursement of monies coming into its control and custody, including appropriate internal controls surrounding such monies. For investments held, all activities will adhere to the individual stipulations with any valid agreement between NAHAC and a federal, state or other grantor agency or organization. Of note, for the Hardest Hit Funds, section (3)(G) of the “Commitment to Purchase Financial Instrument and HFA Participation Agreement” will be followed as it relates to the funds held in the depository account held by the Bank of New York Mellon.</p> <p>As a best practice, NAHAC should maintain a minimum operating reserve at the lowest point during a fiscal year of 25 percent or 3 months of the annual expense budget. Cash and investment balances should be monitored by NAHAC Management on a regular basis to ensure proper cash flow and to determine when additional funds are required.</p>	



NEVADA AFFORDABLE HOUSING ASSISTANCE CORPORATION

CAPITAL ASSETS

Policy Area: Finance	Number: 400.T
Initial Effective Date: 12-19-2013	Initial Approved Date: 12-19-2013
Revised Policy Effective Date: 12-02-2019	Revision – Date Approved: 12-02-2019
Approved by: NAHAC Board of Directors	
<p>PURPOSE:</p> <p>The Board of Directors anticipates that Management will devise and implement techniques and procedures for the proper classification and recordation of capital equipment, especially pertaining to Generally Accepted Accounting Principles (GAAP) as well as the Uniform Guidance as set forth under 2 CFR 200, at a minimum.</p> <p>POLICY:</p> <p>All equipment with an individual value of \$5,000 or more and a useful life of one year or more shall be classified as a capital asset. Appropriate documentation shall be maintained for all capital assets, and such assets shall be depreciated over a reasonable useful life in accordance with the Uniform Guidance. All capital equipment owned by NAHAC shall be tagged and tracked to ensure proper recording and disposal.</p> <p>At such time that capital assets have met their useful life or are otherwise no longer required, such assets shall be disposed of in a timely and appropriate manner. Disposals of capital assets shall follow the disposal requirements set forth in the Uniform Guidance. All disposal procedures or activities to be directed in order to avoid any conflicts of interest.</p>	



NEVADA AFFORDABLE HOUSING ASSISTANCE CORPORATION

HHF DRAWS

Policy Area: Finance	Number: 400.U
Initial Effective Date: 12-19-2013 Revised Policy Effective Date: 12-02-2019	Initial Approved Date: 12-19-2013 Revision – Date Approved: 12-02-2019
Approved by: NAHAC Board of Directors	
<p>PURPOSE:</p> <p>As delineated in Section 3 (Agreement to Purchase Financial Instrument; Payment of Purchase Price; Grant of Security Interest), Page 7, of the “Commitment to Purchase Financial Instrument and HFA Participation Agreement”, specific procedures are necessary to be followed by NAHAC for all Capital Draw Requests related to program involvement.</p> <p>POLICY:</p> <p>NAHAC will ensure that proper, specific, and tested procedures exist to allow for all Capital Draw Requests pertaining to the Hardest Hit Fund program, and all others that may occur from time to time in the future. Appropriate documentation shall be maintained to support draw requests and ensure that they meet the requirements of the HPA Agreement. All requests for draws from the HHF funds shall be prepared by NAHAC Management and submitted to the U.S. Department of the Treasury for approval. In requesting the draw, NAHAC will certify the following:</p> <ul style="list-style-type: none">• No default or Event of Default has occurred and is continuing as of the date and on the funding date;• Each of the representations and warranties made by the eligible entity in the HPA and Financial Instrument are true and correct on and as of such date, as is made on and as of the date and on the Funding date;• Eligible Entity is in compliance with the covenants and other agreement set forth in the HPA and Financial Instrument, which shall remain in full force and effect;• All data and information set forth in the Capital Draw request, including the Capital Draw Schedule, is true and correct in all aspects; and• To the Entities best knowledge, there have been no Acts of Bad Faith by any HHF recipient.	



NEVADA AFFORDABLE HOUSING ASSISTANCE CORPORATION

ORGANIZATIONAL STRUCTURE

Policy Area: Payroll and Human Resources	Number: 500.A
Initial Effective Date: 12-19-2013	Initial Approved Date: 12-19-2013
Revised Policy Effective Date: 12-02-2019	Revision – Date Approved: 12-02-2019
Approved by: NAHAC Board of Directors	
<p>PURPOSE:</p> <p>The organizational structure plays an integral role in assisting the organization in achieving its mission and vision, while providing for a sound control environment. Clearly defined responsibilities and lines of authority provide for an adequate level of accountability and a system for measuring performance for NAHAC personnel. Organizational charts and job descriptions are some resources that organizations use to help accomplish this purpose. An organization chart is a depiction of the reporting lines within the organization and relevant supporting positions. A job description is a structured and factual statement of a job's functions and objectives, defining clearly the boundaries of the job holder's authority, including the job title, department, location, and reporting lines.</p> <p>POLICY:</p> <p>NAHAC will ensure that a timely and accurate organization chart is both created and maintained, reflecting the names and titles of personnel within the organization. The organizational chart, including any changes thereto, requires the approval from the Board of Directors.</p> <p>Each NAHAC position of employment will have an accompanying job description. Each job description will have as its aim the goal of providing the job holder and immediate direct report a clear overall view of the position. Periodic and timely updating of job descriptions will occur for material changes to existing job descriptions at the direction of the CEO/Executive Director or equivalent management official. Job descriptions, including any changes thereto, require the approval from the Board of Directors.</p>	



EMPLOYEE HANDBOOK

Policy Area: Payroll and Human Resources	Number: 500.B
Initial Effective Date: 12-19-2013	Initial Approved Date: 12-19-2013
Revised Policy Effective Date: 11-18-2015	Revision – Date Approved: 11-18-2015
Revised Policy Effective Date: 06-09-2017	Revision – Date Approved: 06-09-2017
Revised Policy Effective Date: 12-02-2019	Revision – Date Approved: 12-02-2019
Approved by: NAHAC Board of Directors	

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Employee Handbook

I. INTRODUCTION

A. Description of the Handbook

This handbook is intended to provide employees of NAHAC (or the "Company") with a general understanding of employment policies, benefits and work rules at NAHAC. Employees are requested to familiarize themselves with its content and keep it available as a reference.

A handbook is a summary of human resource and payroll related business policies and cannot anticipate every situation or answer every employment question about employment or business practices. The handbook is not an employment contract and is not intended to create contractual obligations of any kind. NAHAC reserves the rights to modify, revoke, suspend, terminate, or change any and all such plans, policies or procedures, in whole or in part, at any time, and with or without notice. Employees will be notified of any material changes in a timely fashion.

If any employee has any questions regarding the material covered in this handbook, they are encouraged to contact their supervisor and may request a copy of the policy and procedure for future information. If there is any conflict between the information in the handbook and the information in the Company's policies, the policies will prevail. The information in this manual is current as of the publication date, but is subject to change.

B. Confidentiality

Information about NAHAC, its employees, applicants, suppliers, and vendors must be kept confidential and divulged only to individuals within the Company with both a need to receive and authorization to receive the information. If in doubt as to whether information should be divulged, err in favor of not divulging information and discuss the situation with a supervisor.

All records and files maintained by NAHAC are confidential and remain the property of the Company. Records and files are not to be disclosed to any outside party without the express permission of the CEO/Executive Director or equivalent management official. Confidential information includes, but is in no way limited to: financial records; business and strategic plans; personnel and payroll records regarding current and former employees; the identity of, contact information for, and any other account information on applicants, vendors, and suppliers; programs, techniques, and processes; and any other documents or information regarding the Company's operations, procedures, or practices.

C. Employment At-Will

It is the goal of NAHAC to provide a positive work environment. The Company is aware that personnel changes may be initiated by employees and management alike; in this regard, it is expressly understood that employment at NAHAC shall continue only so long as it is mutually agreeable to both the employee and the Company. Either the employee or NAHAC may terminate employment for any reason, with or without cause, and at any time. No section of this handbook is meant to be construed, nor should be construed, as establishing anything other than

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an employment-at-will relationship, nor does it limit management's discretion to make personnel decisions. Employment occurs when an applicant accepts an offer of employment and a date of hire is agreed upon by NAHAC. All employment is at-will. An employee's job performance will be reviewed regularly throughout the course of employment.

An employee will be responsible to perform any duties as are necessary to the fulfillment of the functions of the assigned job. Other duties may be assigned from time to time. As NAHAC program guidelines and needs are subject to change, job description duties are not meant to be all-inclusive. They serve as a general guide to the employee's principal responsibilities. NAHAC reserves the right to change or modify any aspect of an employee's job duties.

Continued employment with NAHAC is contingent upon continued federal government funding of the Nevada Hardest Hit Fund Program and is for no specific duration.

NAHAC prohibits an employee from working under the immediate supervisor or in the direct line of authority of someone with whom he/she is having a "dating relationship" or a family member, including a spouse, child, parent, aunt, uncle, niece, nephew, grandparent, grandchild, or first cousin or the same relation by marriage.

Overtime: Any overtime eligibility, if any, will be determined in accordance with the Fair Labor Standards Act. Employees are expected to accurately report all hours worked.

D. 90 Day Probationary Period

An employee's first ninety (90) days of employment are on a trial basis and are considered a continuation of the employment selection process. The ninety (90) day probationary period provides the Company an opportunity to observe and evaluate the capacity of the employee, which includes the employee's ability to satisfactorily perform the essential functions of his or her job; and to observe and evaluate the employee's work habits and conduct, including attendance and the employee's relationship with coworkers and superiors. During this probationary period, the Company may terminate employment immediately, with or without cause and with or without notice. Likewise, the employee may also terminate his or her employment with the Company at any time, with or without notice and with or without cause. This 90 day probationary period is not a term of employment and is not intended, nor does it, impact the at will nature of the relationship between the Company and the employee.

E. Equal Opportunity Employment

NAHAC endorses the rights of equal opportunity found within state and federal legislation. The Company offers equal opportunity for all people regardless of race, color, religion, gender, disability, sexual orientation, marital status or any other basis protected by federal, state or local regulations. Employment selection procedures enhance this commitment as well as providing an environment that encourages training and promotional opportunities free of discrimination.

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To comply with applicable laws ensuring equal employment opportunities to qualified individuals with a disability, NAHAC will make reasonable accommodations for known physical or mental limitations of an otherwise qualified individual with a disability who is an applicant or an employee unless undue hardship would result.

Any applicant or employee who believes they have been subjected to any form of unlawful discrimination, or who believe they require an accommodation in order to perform the essential functions of the job should contact NAHAC corporate counsel immediately.

F. Nepotism, Employment of Relatives and Personal Relationships

NAHAC wants to ensure that corporate practices do not create situations such as conflict of interest or favoritism. This extends to practices that involve employee hiring, promotion and transfer. Close relatives, partners, those in a dating relationship or members of the same household are not permitted to be in positions that have a reporting responsibility to each other. Close relatives are defined as husband, wife, domestic partner, father, mother, father-in-law, mother-in-law, grandfather, grandmother, son, son-in-law, daughter, daughter-in-law, uncle, aunt, nephew, niece, brother, sister, brother-in-law, sister-in-law, step relatives, cousins and domestic partner relatives.

If an employee begins a dating relationship or become relatives, partners or members of the same household, and if one party is in a supervisory position, that person is required to inform the CEO/Executive Director or equivalent management official, and the Board of Directors.

NAHAC reserves the right to apply this policy to situations where there is a conflict or the potential for conflict because of the relationship between employees, even if there is no direct-reporting relationship or authority involved.

Employment of a relative requires the written approval of the Board of Directors.

G. Employee Relative - Vendor Transactions

This section covers restrictions on the use of employee relative-vendor relationships, as suppliers of goods and services (including consultant services).

A relative is defined as an employee's spouse, child, parent, brother, sister, son-in-law, daughter-in-law, father-in-law, mother-in-law, brother-in-law, sister-in-law, and step-relatives in the same relationship. Near relative also includes an employee's domestic partner or individual with one of the above relationships to the domestic partner.

It is the policy of NAHAC to separate an employee's private interests from the Company's business in order to safeguard NAHAC and its employees against charges of favoritism in acquisition of goods and services. No vendor arrangements with relatives, as defined, are permitted.

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H. Harassment

NAHAC prohibits harassment of any employee. Federal and state laws prohibit harassment of employees or applicants and require employers to take reasonable steps to prevent harassment.

NAHAC will promptly investigate and respond to all complaints of harassment. Any employee who believes he or she has been the victim of harassment or has witnessed harassment should report it immediately to his/her supervisor. If the harassing party is a supervisor, the incident must be reported promptly to corporate counsel.

Forms of harassment may include, but are not limited to the following:

Verbal harassment; i.e.: suggestive, insulting, or derogatory comments, innuendoes, sounds, jokes, teasing, whistling, or slurs and unwanted sexual propositions or threats.

Physical harassment; e.g. impeding or blocking movement, or any unwanted physical contact or interference with normal work or movement, unwanted gender advances, including touching, pinching, brushing the body, sexual contact or assault.

Visual harassment; i.e.: derogatory posters, cartoons, suggestive objects, pictures, letters, or drawings; also such actions as leering or obscene gestures.

Gender harassment is defined as any unwelcome sexual advances, requests for sexual favors and other verbal or physical conduct of a sexual nature that, (1) has been made explicitly or implicitly a term of condition of an individual's employment, (2) is used as a basis for employment decisions such as promotions and benefits affecting such individual, or (3) substantially interferes with an individual's work performance or creates an intimidating, hostile, or offensive working environment.

Any employee who believes he/she has been harassed by a co-worker, supervisor, vendor, applicant or agent of NAHAC should immediately report the facts of the incident(s) and the names of the individuals involved to his/her supervisor or corporate counsel. Such employees should not fear any reprisal. All employees should immediately report any incident(s) of harassment they witness to a management representative.

After a report is received, an internal investigation will be undertaken immediately. Any supervisor, agent or other employee who has been found by the Company, after investigation, to have harassed another employee in violation of this policy will be subject to discipline. Discipline may range from a warning to termination of employment.

If the internal investigation does not remedy the harassment to the employee's satisfaction, the employee may file a harassment charge with the local office of the State Department of Employment, Training and Rehabilitation (DETR), or notify the Nevada Equal Rights Commission (NERC). The addresses and phone numbers of the



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Nevada DETR, as well as the local offices of NERC, are listed in the white pages of the phone book or available on the internet at their respective web sites.

The law prohibits any employer from retaliating against any employee for filing a charge, or for cooperating in any manner with the DETR or EEOC in its investigation of the charge.

Retaliation against anyone for filing a complaint or participating in an investigation is prohibited.

“Retaliation” means any adverse conduct taken because someone has reported harassment or discrimination, or has participated in the complaint and investigation. “Adverse conduct” includes: taking sides because an individual has reported harassment or discrimination; spreading rumors about a complaint; shunning and avoiding an individual who reports harassment or discrimination; or real or implied threats of intimidation to prevent an individual from reporting harassment or discrimination.

Individuals found to have retaliated in violation of this policy will be subject to discipline including the possibility of termination.

If you have any questions concerning this policy, please contact corporate counsel immediately.

II. EMPLOYMENT POLICIES AND PRACTICES

A. Background Checks

To ensure that individuals who join NAHAC are well qualified and to ensure that NAHAC maintains a safe and productive work environment, it is our policy to conduct pre-employment background checks on all applicants who accept an offer of employment.

The Company reserves the right to investigate an individual’s prior employment history, credit history, DMV records, personal references, educational and criminal background, as well as other relevant information that is reasonably available to the Company.

All offers of employment are conditioned on receipt of a background check report that is acceptable to NAHAC. Background checks are conducted in conformity with the Fair Credit Reporting Act, the Americans with Disabilities Act, and state and federal privacy and anti-discrimination laws. Reports are kept confidential and are only viewed by individuals involved in the hiring process.

NAHAC also reserves the right to conduct a background check for current employees to determine eligibility for promotion or reassignment in the same manner as described above.

B. Immigration Compliance

NAHAC will comply with applicable immigration laws, including the Immigration Reform and Control Act of 1986 and the Immigration Act of 1990. As a condition of employment, every individual must provide satisfactory

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evidence of his or her identity and legal authority to work in the United States. Applicants may select to provide any form of acceptable identification from a list of documents provided when completing I-9 form.

C. Employment Classifications

1. Regular Employees

Regular employees are those who are hired to work on a regular schedule. Regular employees may be classified as full-time or part-time.

2. Full-Time Employees

Regular full-time employees are those who are regularly scheduled to work 40 hours per week.

3. Part-Time Employees

Part-time employees are those who are regularly scheduled to work less than 40 hours per week. Part-time employees who are regularly scheduled to work at least 30 hours per week are eligible for the benefits described in this handbook. Personal hours and sick hours may be pro-rated for employees regularly working less than 40 hours per week.

Part-time employees who are scheduled to work less than 30 hours per week are not eligible for benefits.

4. Temporary Employees

Temporary employees are those employed for short-term assignments. Short-term assignments generally will be periods of three months or less. Temporary employees are not eligible for employee benefits except where mandated by law.

5. Inactive Status

Employees who are on an approved leave of absence that exceeds 3 months will be placed on inactive status. During the time the employee is on inactive status, personal and sick time will not accrue.

6. Temporary Transfers

Employees who request a transfer to another job for medical reasons may be considered for a temporary transfer if a position exists at the time the transfer is requested and the employee is qualified to perform the job. The employee will be paid in accordance with the responsibilities and duties of the temporary job.

7. Job Duties

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During the job training period, the employee will be trained in the primary job responsibilities and performance standards. From time to time employees may be asked to work on a special assignment or to assist with other work necessary or important to the operation of the Company.

NAHAC reserves the right, at any time, with or without notice, to alter or change job responsibilities, reassign or transfer job positions, or assign any additional responsibilities.

8. Exempt Employees

Certain jobs are exempt from the overtime provisions pursuant to the requirements of the Fair Labor Standards Act. In general, NAHAC considers the following positions exempt from overtime: managers, professional staff attorneys and professional staff responsible for projects.

9. Non-Exempt Employees

Non-exempt employees are paid for time worked and are subject to the overtime provisions of the state and federal labor laws. NAHAC considers all positions not listed above under exempt positions to be 'non-exempt' jobs.

D. Work Schedules

NAHAC normal business hours are Monday through Friday between the hours of 8:00 a.m. and 5:00 p.m. Employees are expected to work normal business hours unless the CEO/Executive Director or equivalent management official approves an alternative work schedule. NAHAC reserves the right to request employees to work other schedules, including Saturdays, if needed to carry out the mission of the Company.

The workday (a consecutive 24-hour period) begins at 12:01 a.m. and ends at midnight. The workweek begins on Sunday and ends on Saturday.

E. Meal/Rest Periods

The scheduling of meal periods at NAHAC is set by the employee's immediate manager with the goal of providing the least possible disruption to company operations.

1. Mandatory Meal Period

Employees who work at least 8 consecutive hours will be provided a meal break not to exceed 60 minutes. Non-exempt employees are to be completely relieved of all job duties while on meal breaks and must record time for meal periods on their timesheet. Meal periods are unpaid and should not be included in the total hours of work per day.

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2. Rest Breaks

Employees are permitted a 10-minute rest break for each four hours of work. Employees on rest breaks are not required to clock in and clock out because rest breaks are paid and considered time worked.

3. Impermissible Use of Meal Period and/or Rest Breaks

Neither the lunch period nor the rest break(s) may be used to account for an employee's late arrival or early departure or to cover time off for other purposes—for example, rest breaks may not be accumulated to extend a meal period, and rest breaks may not be combined to allow an extended break from work.

F. Personnel Records

Employees have a right to inspect certain documents in the personnel file, as provided by law, in the presence of a Company representative at a mutually convenient time. Employees may provide documentation for any disputed item which will be maintained in the personnel file along with the original document.

NAHAC will restrict disclosure of the personnel file to authorized individuals within the Company or to law enforcement and regulatory agencies with proper authority. Any request for information from personnel files must be directed to corporate counsel or a designated management representative. Only corporate counsel or a designated management representative may release information about current or former employees.

Disclosure of personnel information to outside sources is limited. However, NAHAC will cooperate with requests from authorized law enforcement or local, state or federal agencies conducting official investigations and as otherwise legally required.

G. Employee References

All requests for references must be directed to the payroll manager. No NAHAC manager, supervisor, or employee is authorized to release references for current or former employees. NAHAC's policy regarding references for former employees is to send the reference request to the payroll provider who will disclose dates of employment and the job title of the last position held.

If a current or former employee authorizes disclosure in writing, the Company will provide a prospective employer with information on the amount of salary or wage earned.

H. Termination of Employment

1. Reductions in Force

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While NAHAC hopes to continue providing employment opportunities, business conditions, applicant demands, and other factors are unpredictable. Changes or downturns in any of these or other areas could create a need to restructure or to reduce the number of people employed.

In determining which employees will be subject to layoffs, the Company will take into account, among other things, operational requirements, the skill, productivity, ability, past performance and length of service. On the last day of employment, the employee must return all NAHAC property, including keys, I.D. cards, etc.

2. Discipline and Involuntary Terminations

Violation of Company policies and rules may warrant disciplinary action. NAHAC reserves the right to utilize discipline that may include verbal warnings, written warnings, demotion, suspension and termination. The system is not formal and the Company may, at its sole discretion, utilize whatever form of discipline is deemed appropriate for the circumstances, up to and including termination of employment. The Company's policy of discipline does not limit or alter the at-will employment relationship. When notified of the termination, the employee must return all NAHAC property and must leave the premises by the date specified.

3. Voluntary Termination

An employee who voluntarily resigns his/her employment or fails to work for three consecutively scheduled workdays without notice to, or approval by his/her supervisor will be considered to have voluntarily terminated employment with NAHAC. All Company-owned property must be returned in good working order immediately upon termination of employment.

STANDARDS OF CONDUCT

A. Prohibited Conduct

In order to assure orderly operations and provide the best possible work environment, NAHAC expects employees to follow rules of conduct that will protect the interests and safety of all personnel. It is not possible to list all the forms of behavior that are considered unacceptable in the workplace, but the following are examples of infractions of rules of conduct that may result in disciplinary action, including suspension, demotion or termination of employment.

- Falsification of employment records, employment information, or other records.
- Falsification of time sheets, whether your own or another employee's.
- Unauthorized use of Company equipment, time, materials, or facilities.
- Possessing, distributing, selling, transferring, or using or being under the influence of alcohol or illegal drugs or willful misuse of prescription drugs in the work area.

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- Provoking a fight or fighting at any time during working hours or on premises owned or occupied by the Company.
- Carrying firearms or any other dangerous weapons, at any time during working hours or on premises occupied by the Company.
- Causing, creating, or participating in a disruption of any kind during working hours or on premises occupied by the Company.
- Insubordination, including but not limited to failure or refusal to obey the orders or instructions of any supervisor or management representative, or the use of abusive or threatening language toward any supervisor or management representative.
- Failing to notify the appropriate supervisor when unable to report to work.
- Failing to obtain permission to leave work for any reason during normal working hours.
- Failing to observe working schedules, including rest and lunch periods.
- Failing to provide a physician's certificate when requested or required to do so.
- Wearing unprofessional or inappropriate styles of clothing or hair while working.
- Violating any safety, health, or security policy, rule or procedure of the Company.
- Committing a fraudulent act or a breach of trust in any circumstances.
- Unauthorized distribution or release of confidential information.

Although employment may be terminated at-will by either the employee or the Company at any time, without following any formal system of discipline or warning, the Company may exercise its discretion to utilize forms of discipline that are less severe than termination. Examples of less severe forms of discipline include verbal warnings, written warnings, demotions and suspensions. While one or more of these forms of discipline may be taken in connection with a particular employee, no formal order or procedures are necessary.

In most cases, NAHAC imposes progressive discipline, starting with verbal warnings. Nevertheless, when disciplinary action is the result of performance or conduct which an employee knows or reasonably should have known was unsatisfactory, NAHAC may immediately impose more serious discipline including termination. Examples of performance or conduct that would warrant immediate serious discipline include violations of law, dishonesty, theft or misappropriation of NAHAC property, fighting on the job, insubordination, acts endangering others, or other serious misconduct.

This statement of prohibited conduct does not alter or limit the Company's policy of employment at-will.

B. Drug and Alcohol Abuse

NAHAC is concerned about the use of alcohol, illegal drugs or controlled substances as it affects the workplace. Use of these substances can adversely affect an employee's work performance, efficiency, safety and health. In addition, the use or possession of these substances on the job constitutes a potential danger to the welfare and safety of other employees and exposes the Company to the risks of property loss or damage, or injury to other persons. Furthermore, the use of prescription drugs and/or over-the-counter drugs also may affect an employee's job performance.

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The following rules and standard of conduct apply to all employees either on Company property or during the workday, and forbids:

- Possession or use of alcohol, or being under the influence of alcohol while on the job.
- Driving a vehicle while under the influence of alcohol or drugs.
- Distribution, sale or purchase of an illegal or controlled substance while on the job.
- Possession or use of an illegal, controlled substance or being under the influence of an illegal or controlled substance while on the job.

In order to enforce this policy, the Company reserves the right to conduct searches of Company property or employees' property including, but not limited to employee lunch boxes, baggage, private vehicles parked on Company premises or work-site, and to implement other measures necessary to deter and detect abuse of this policy.

An employee who is using prescription or over-the-counter drugs that may impair the employee's ability to safely perform the job, or affect the safety or wellbeing of others, must notify his/her supervisor of such use immediately before starting or resuming work.

An employee's conviction on a charge of illegal use, sale or possession of any controlled substance while off Company property will not be tolerated. In accordance with the Drug Free Workplace Act of 1988, the Company will take appropriate action against a convicted employee up to and including termination, or the satisfactory participation in a drug abuse assistance or rehabilitation program, depending upon the circumstances of each employee's situation.

NAHAC will encourage and reasonably accommodate employees with chemical dependencies (alcohol and/or drugs) to seek treatment and/or rehabilitation. Employees desiring such assistance should request a leave of absence in order to obtain treatment or rehabilitation. The Company is not obligated, however, to continue to employ any person whose performance of essential job duties is impaired because of drug or alcohol use, nor is the Company obligated to re-employ any person who has participated in treatment and/or rehabilitation if that person's job performance remains impaired as a result of dependency. Additionally, employees who are given the opportunity to seek treatment and/or rehabilitation, but fail to successfully overcome their dependency or problem, will not automatically be given a second opportunity to seek treatment and/or rehabilitation.

C. Punctuality and Attendance

NAHAC expects all employees to report to work on a reliable and punctual basis. Absenteeism, early departures from work and late arrivals burden other employees and the Company. If an employee cannot avoid being late to work or is unable to work as scheduled, they are required to notify their supervisor as soon as possible. Once on premises, employees are expected to begin performing their required job tasks. 'Social hour' gatherings that interfere with maintaining employee work-loads or that may result in delays in meeting with Company clients will not be tolerated and those participating in excessive socialization may be subject to discipline.

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An employee is required to inform their supervisor of the expected duration of any absence. The Company will comply with any applicable laws relating to time off from work but it is the employee's responsibility to provide sufficient information to enable the Company to make a determination. Excessive absenteeism may lead to disciplinary action, up to and including termination of employment.

If an employee fails to report for work without any notification to their supervisor and such unreported absence continues for a period of three days, the Company will consider that the employee has abandoned employment and has voluntarily terminated employment.

D. Employee Dress and Appearance

Employees contribute to the culture and reputation of NAHAC in the way they present themselves. To provide a positive impression to our applicants and other members of the public, all employees must present a professional business appearance at work. Applicants will be seen on Company premises throughout the work week and as such, professional attire and professional behavior are expected at all times during business hours. The following are some guidelines:

- Clothing must be clean and neat and not constitute a safety hazard.
- All employees should practice common sense regarding good taste and comfort, and avoid any extremes in dress, accessories, fragrances or hair.
- Undergarments should not be visible.
- Provocative, tight or revealing clothing is prohibited.
- Jeans which are shredded, contain holes or are cut-off are prohibited, as are tank tops, muscle shirts, crop tops, shorts, halter tops, T-shirts with inappropriate slogans, jogging suits and/or flip flops.
- Gym wear, beach wear or club apparel is not permitted at any time.

Management may make exceptions to the dress code for special occasions. Business casual is permitted on Fridays except when suspended based on business needs. Employees are encouraged to contact their manager for specific information regarding acceptable attire.

If an employee reports to work dressed or groomed inappropriately, they will be asked to clock out and will be sent home to change. The employee may request vacation time or unpaid time off to change clothing. Repeated incidents may result in disciplinary action.

E. Use of Social Media

Employees may not post financial, confidential, sensitive or proprietary information about the company, clients, employees or applicants on the internet or any social media site. Employees are also prohibited from posting obscenities, slurs or personal attacks that can damage the reputation of the company, clients, employees or applicants on the internet or any social media site.

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Employees are prohibited from using and/or editing the company social media sites. The only employees authorized to make edits to the company sites are designated management representatives or individuals otherwise specified by the CEO/Executive Director or equivalent management official.

NAHAC may monitor content on the Internet. Policy violations may result in discipline up to and including termination of employment.

F. Workplace Violence

Acts or threats of physical violence, including intimidation, harassment and/or coercion that involve or affect the Company or that may occur on Company property will not be tolerated. The personal safety and health of each employee is of primary importance.

It is the responsibility of all employees to support safety and health programs by reporting any threats received or restraining orders granted against a disgruntled spouse, domestic partner, acquaintance or co-worker. All incidents of direct or indirect threats and actual violent events will be treated seriously. A direct or indirect threat and/or actual violence will be documented and reported to the CEO/Executive Director or equivalent management official, NAHAC's legal counsel and the Board of Directors. All incidents will be immediately investigated, and appropriate action will be taken.

G. Workplace Bullying

Employees will be treated with dignity and respect. In no instance will NAHAC tolerate bullying behavior. NAHAC defines bullying as repeated inappropriate behavior, either direct or indirect, whether verbal, physical or otherwise, conducted by one or more persons against another or others, at the place of work or in the course of employment.

Bullying may be intentional or unintentional. However, it must be noted that where an allegation of bullying is made, the intention of the alleged bully is irrelevant, and will not be given consideration when meting out discipline. As in sexual harassment, it is the effect of the behavior upon the individual that is important. NAHAC considers the following types of behavior examples of bullying:

- Verbal Bullying — slandering, ridiculing or maligning a person or his or her family; persistent name calling which is hurtful, insulting or humiliating; using a person as the butt of jokes; abusive and offensive remarks.
- Physical Bullying — pushing; shoving; kicking; poking; tripping; assault, or threat of physical assault; damage to a person's work area or property.
- Gesture Bullying — non-verbal threatening gestures; glances which can convey threatening messages.

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III. OPERATIONAL POLICIES AND PRACTICES

A. Employer Property

Desks, workstations, computers, vehicles and other designated property are Company property and must be maintained according to Company rules and regulations. The Company reserves the right to inspect all Company property to insure compliance with its rules and regulations, without notice to the employee and/or in the employee's absence.

You are expected to demonstrate proper care when using NAHAC property and equipment. No property may be removed from the premises without proper authorization from a management representative. If you lose break or damage any property, report it to management immediately. NAHAC's computers and communication resources are intended for work-related purposes only.

B. Employee Property

An employee's personal property, including but not limited to, packages, purses, backpacks, etc., may be inspected upon reasonable suspicion of unauthorized possession of Company property.

NAHAC is not responsible for loss or damage to personal property. Personal items such as purses, wallets or other valuable items should not be left in areas where theft might occur. This also applies to personal property left in vehicles parked on property.

C. Use of Technology

NAHAC's technical resources – including desktop and portable computer systems, fax machines, voice mail, pagers, cellular telephones, and electronic mail (e-mail) – enable employees quickly and efficiently to access and exchange information throughout the Company. When used properly, these resources greatly enhance employee productivity and knowledge. In many respects, these tools are similar to other Company tools, such as stationery, file cabinets, photocopiers and telephones. Because these technologies are rapidly changing, it is important to explain how they fit within the Company and within your responsibilities as an employee.

This policy applies to all technical resources that are owned or leased by the Company, that are used on or accessed from Company premises, or that are used for Company business. This policy also applies to all activities using any Company-paid accounts, subscriptions, or other technical services, such as voice mail and e-mail, whether or not the activities are conducted from Company premises. For additional information and clarification regarding this policy, employees should reference NAHAC's Information Security and Safeguards Program document.

NOTE: As an employee uses the Company's technical resources, it is important to remember the nature of the information created and stored. E-mail messages are sometimes casual, like a conversation, and not as carefully thought out as a letter or memorandum. Like any other document, an e-mail message or other computer information can later be used to indicate what an employee knew or felt. Employees should keep this in mind

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when creating e-mail messages and other documents. Even after an e-mail message is deleted or a file is closed during a computer session, it may still be recoverable and may remain on the system.

1. Acceptable Uses

NAHAC's technical resources are provided for the benefit of the Company and its applicants, vendors and suppliers. These resources are provided for use in the pursuit of Company business and are to be reviewed, monitored, and used only in that pursuit.

Employees are not permitted to use the Company's technical resources for non-work purposes. Accordingly, employees have no right of privacy as to any information or file maintained in or on the Company's property or transmitted or stored through the Company's computer, voice mail, e-mail, or telephone system.

2. Unacceptable Uses

NAHAC's technical resources should not be used for personal gain or the advancement of an individual's views. Employees who wish to express personal opinions on the Internet should obtain a personal account with a commercial Internet service provider. The employee may not access the Internet for personal reasons using Company resources.

Solicitation for any non-Company business or activity using Company resources is strictly prohibited. The use of the Company's technical resources must not interfere with an employee's productivity, the productivity of any other employee, or the operation of the Company's technical resources.

An employee is prohibited from sending e-mail or other communications that mask the employee's identity or indicate that they were sent by someone else. An employee should never access any technical resources using another employee's password. Similarly, an employee should only access the libraries, files, data, programs, and directories that are related to their specific work duties. Unauthorized review, duplication, dissemination, removal, installation, damage, or alteration of files, passwords, computer systems or programs, or other property of the Company, or improper use of information obtained by unauthorized means, is prohibited.

Sending, saving, or viewing offensive or inappropriate material is prohibited. Messages stored and/or transmitted by computer, voice mail, e-mail, or telephone systems must not contain content that may reasonably be considered offensive. Offensive material includes, but is not limited to, sexual comments, jokes or images, racial slurs, gender-specific comments, or any comments, jokes or images that would offend someone on the basis of his or her race, color, creed, sex, age, national origin or ancestry, physical or mental disability, veteran status, marital status, medical condition, sexual orientation, as well as any other category protected by federal, state, or local laws. Any use of the Company's technical resources to harass or discriminate is unlawful and strictly prohibited by the Company. Violators will be subject to discipline, up to and including discharge.

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3. Access to Information

NAHAC reminds employees to keep in mind that when using the Company's computers the employee is creating Company documents using a Company asset. The Company respects the individual privacy of its employees. However, that privacy does not extend to an employee's work-related conduct or to the use of Company-provided technical resources or supplies.

All information, including e-mail messages and files, that are created, sent, or retrieved over the Company's technical resources are the property of the Company, and should not be considered private or confidential. Employees have no right to privacy as to any information or file transmitted or stored through the Company's computer, voice mail, e-mail, or telephone systems. Any electronically stored information that you create, send to, or receive from others may be retrieved and reviewed when doing so serves the legitimate business interests and obligations of the Company. Employees should also be aware that, even when a file or message is erased, it is still possible to recreate the message. The Company reserves the right to monitor the use of its technical resources at any time. All information including text and images may be disclosed to law enforcement or to other third parties without prior consent of the sender or the receiver.

4. Copyrighted Materials

Employees are prohibited from copying and/or distributing copyrighted materials (e.g., software, database files, documentation, articles, graphics files and downloaded information) through the e-mail system or by any other means unless the employee has confirmed, in advance, with a management representative that the Company has the right to copy or distribute the material. Failure to observe a copyright may result in disciplinary action by the Company as well as legal action by the copyright owner. Any questions concerning these rights should be directed to your supervisor.

5. Confidential Information

E-mail and Internet/Web accesses are not entirely secure. Others outside the Company may also be able to monitor your e-mail and Internet/Web access. For example, Internet sites maintain logs of visits from users; these logs identify which Company, and even which particular person, accessed the service. If an employee's work using these resources requires a higher level of security, please contact the CEO/Executive Director or equivalent management personnel for guidance on securely exchanging e-mail or gathering information from sources such as the Internet or World Wide Web.

All employees must safeguard the Company's confidential information, as well as that of applicants and others, from disclosure. Do not access new voice-mail or e-mail messages with others present. Messages and work containing confidential information should not be left visible when an employee is away from their work area.

6. Company's Software Policy

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If an employee has a need to install software on Company computers, the Supervisor must contact the Company's information technology representative and request to have the software installed. Employees are prohibited from installing any software on any Company technical resource.

Involving the Company's information technology representative ensures that the Company can manage the software on Company systems, prevent the introduction of computer viruses, and meet its obligations under any applicable software licenses and copyright laws. Employee computers are the sole possession of the Company and as such are subject to inspection and monitoring at all times. Employees surfing the internet and/or introducing a computer virus or other destructive or nuisance software will be subject to discipline.

7. Employee Responsibilities

Each employee is responsible for the content of all text, audio, or scanned images that they place or send over the Company's technical resources. Employees may access only files or programs, whether computerized or not, that they have permission to enter.

Because all work areas will be subject to frequent client visitations, all client records must be kept in a discrete manner and not subject to viewing by the public or other Company staff with no direct responsibility relative to the applicant's records.

Violations of any guidelines in this policy may result in disciplinary action up to and including termination.

8. Email Use

NAHAC has installed an internal electronic mail ("email") system to facilitate the transmittal of business-related information within NAHAC and with persons and entities outside NAHAC. Email should only be used for NAHAC business. Unrelated use is prohibited.

There is no right to privacy for emails transmitted or received by NAHAC's email system. NAHAC reserves the right to review, audit, intercept, access, and disclose all messages created, received or sent via NAHAC's email.

Email may not be used to solicit for commercial ventures, religious or political causes, outside organizations, or other non-work related solicitations. The creation of offensive messages will be considered a violation of NAHAC's anti-harassment policy.

When selecting recipients from a directory, be careful that you don't send your message to the wrong person. To avoid accidental disclosure of information, don't include external recipients on internal distribution lists.

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Sending or forwarding chain letters is not allowed. If you receive one, delete it without opening any attachment, which may contain a virus.

D. Health and Safety

The health and safety of employees and others on NAHAC property are of critical concern to Company. The Company strives to attain the highest possible level of safety in all activities and operations. The Company also intends to comply with all health and safety laws applicable to its business.

To this end, NAHAC must rely upon employees to ensure that work areas are kept safe and free of hazardous conditions. Employees should be conscientious about workplace safety, including proper operating methods and known dangerous conditions or hazards. The employee must report any unsafe conditions or potential hazards to their supervisor *immediately*; even if they believe the problem has been corrected. If an employee suspects a concealed danger is present on the Company's premises, or in a product, facility, piece of equipment, process, or business practice for which Company is responsible, it must be brought to the attention of the supervisor or any available manager immediately.

Periodically, the Company may issue rules and guidelines governing workplace safety and health. All employees should familiarize themselves with these rules and guidelines as strict compliance will be expected. Contact your supervisor for copies of current rules and guidelines. Failure to comply strictly with rules and guidelines regarding health and safety or negligent work performance that endangers health and safety will not be tolerated.

Any workplace injury, accident, or illness must be reported to your supervisor as soon as possible, regardless of the severity of the injury or accident. If medical attention is required immediately, supervisors will assist employees in obtaining medical care, after which the details of the injury or accident must be reported.

Evacuation drills are scheduled periodically throughout the year. These drills are a critical element of employee safety. Complete cooperation during these drills is required.

In the event of an emergency, employees should immediately contact security personnel for your location. Emergencies include all accidents, medical situations, bomb threats, other threats of violence, and the smell of smoke. Nevertheless, in cases where you are in imminent danger of harm or injury, you should first evacuate to safety before contacting security personnel. If you cannot reach security personnel immediately, call 911.

When events warrant an evacuation of the building/offices, you should follow the instructions of security personnel or management. In cases of imminent danger of harm or injury, you should evacuate to safety immediately without waiting for instructions. Leave the building in a brisk and orderly manner and, if possible, assemble at the designated meeting place to await further instructions or information. If you are able to do so without endangering yourself, you should help evacuate physically disabled persons. In the case of fire or smoke when on upper levels, use stairways to exit the premises. Do not use elevators.

Should an emergency result in the need to communicate information to employees outside of business hours, management will be responsible for organizing that effort. You should keep your personal contact information up

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to date by advising the office administrator or the CEO/Executive Director or equivalent management official whenever your information changes.

E. Smoking Policy

Employees, applicants, vendors, and other guests are not allowed to smoke in or immediately by Company facilities at any time. Smoking is not allowed in applicant areas, Company vehicles, or in restrooms.

F. Solicitation and Distribution of Literature

In order to ensure efficient operation of NAHAC's business and to prevent annoyance to employees, it is necessary to control solicitation and distribution of literature and the sale of out-side products and services on Company property.

No employee shall solicit or promote support for any cause or organization during his or her working time or during the working time of the employee or employees at whom such activity is directed. Cause-specific clothing, adornments or campaign or 'cause' buttons are specifically prohibited in the work place.

Under no circumstances will non-employees be permitted to solicit or to distribute written material or to sell any product or service on Company property.

G. Housekeeping

All employees are expected to keep their work areas clean and organized. Common areas such as lunchrooms, restrooms, workshop, etc., are to be kept clean and safe by those using them. Please clean up after meals and dispose of trash properly.

H. Telephone Use

Telephones are a vital part of the Company's business as they are used to regularly conduct business. Personal use of the telephone should be limited to emergencies and unusual circumstances. Chronic misuse of Company telephone lines may subject the violator of this policy to progressive discipline.

V. BENEFITS

A. Holidays

The following paid holidays are observed each calendar year:

- New Year's Day
- Martin Luther King Day
- President's Day
- Memorial Day
- Independence Day

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- Labor day
- Nevada Day
- Veteran's Day
- Thanksgiving Day
- Family Day (Day after Thanksgiving)
- Christmas Day

Usually when a holiday falls on a Saturday, it will be observed on the preceding Friday. When a holiday falls on a Sunday, it will be observed on the following Monday.

To be eligible for holiday pay, an employee must work the regularly scheduled working days immediately preceding and immediately following the holiday. Personal time, sick time and other authorized absences are considered time worked for the purpose of payment of holiday pay.

B. Paid Time Off (PTO)

Regular full-time employees and part-time employees working at least 30 hours per week are eligible to accrue Paid Time Off (PTO). This does not apply to temporary employees. Employees accrue PTO for each bi-weekly pay period actually worked beginning at the start of the first pay period after completing 30 days of employment at 4 hours per week. Eight hours of PTO per pay period is equal to approximately 23 paid days for each year of employment, dependent upon start date of employment. Accrued PTO not used during each year of employment may be carried forward to the following year of employment. Employees may carry over no more than 240 hours of PTO not used during each year of employment. Hours in excess of 240 will be calculated through the last pay period prior to the anniversary date.

PTO is available only for the hours accrued as of the prior payroll period. PTO requests must be approved in advance by the Manager and the CEO/Executive Director or equivalent management official. Depending upon Company needs and business requirements, PTO may be denied at management's discretion.

An employee who terminates employment will be paid for PTO accrued through the last completed pay period. Employees on unpaid leave will not accrue PTO. Employees will be permitted to cash out a minimum of 40 hours and a maximum of 80 hours of PTO one time per year of employment. This does not apply to hours that must be cashed out in excess of the annual maximum of 240 hours. After the calculation of a cash out there must be a remaining balance of at least 40 hours. Employees are required to submit the completed PTO cash out form to the Manager and the CEO/Executive Director or equivalent management official. The request is subject to approval. PTO cash out will be permitted for time earned and not for future accrued hours. Employees must allow up to two pay periods before the cash out will be issued. PTO cash out will be disbursed during a regular payroll cycle.

C. Insurance

NAHAC offers a competitive insurance plan for all its employees. Coverage commences on the 1st day of the month after completion of 60 days of employment. Employees may elect to enroll their eligible dependents for group coverage. For full-time employees, NAHAC contributes 100% of the cost for single coverage of the employee only for major medical, dental, vision, long-term disability, and basic group term life. In addition, for full-time employees, NAHAC contributes the following percentages for dependent or family coverage for major

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medical only, excluding ancillary medical benefits such as dental, vision, long-term disability and basic group term life: 75% for spouse and 50% for children. Employees are responsible for paying the balance through payroll deduction.

Employees may adjust coverage during open enrollment periods or upon a change in family status. The open enrollment period is decided by NAHAC. Family status changes include marriage, divorce, death of a spouse or child, birth or adoption of a child or termination of employment of your spouse or registered domestic partner.

D. Workers' Compensation Insurance

If an employee becomes injured or ill due to conditions present on the job, then they may receive, at no cost, workers' compensation insurance benefits which may include medical care, compensation, and vocational rehabilitation. To receive workers' compensation benefits, an employee must:

- Report any work-related injury to the Supervisor immediately.
- Complete a written claim form and return it to the supervisor.
- Seek medical treatment and follow-up care if required.

The law requires that NAHAC notify workers' compensation insurance of any concerns of false or fraudulent claims. Any person who makes or causes to be made any knowingly false or fraudulent material statement or material misrepresentation for the purpose of obtaining or denying workers' compensation benefits or payments is guilty of a felony. A violation of this law is punishable by imprisonment for one to five years, or by a fine not exceeding \$50,000.00 or double the value of the fraud, whichever is greater, or both. Additional civil penalties may be in order.

E. COBRA

If the organization is eligible, an employee may be entitled to continue insurance coverage under the federal Consolidated Omnibus Budget Reconciliation Act (COBRA) upon termination of employment, as well as for other "qualifying events". For more information please contact the office administrator.

Employees and their covered dependents may continue medical and dental benefits for up to 18 months under the provisions of COBRA when group medical and dental coverage for you and your covered dependents would otherwise end due to your death or because:

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- Your employment terminates, for a reason other than gross misconduct;
- Your employment status changes due to a reduction in hours;
- Your child ceases to be a “dependent child” under the terms of the medical and dental plan;
- You become divorced or legally separated; or
- You become entitled to Medicare.

The office administrator will notify individuals of their right to elect COBRA continuation coverage, if eligible. In the event of divorce, legal separation, or a child’s loss of dependent status, you or a family member must notify the office administrator within 60 days of the event. NAHAC will supply the documents to apply for COBRA coverage.

F. Leaves of Absence

1. Medical Leaves

A medical leave of absence may be granted for temporary medical disabilities for up to 90 days with a doctor’s written certification of disability. Requests for leave should be made in writing as far in advance as possible. If an employee is approved for a medical leave, NAHAC will pay equivalent to your accumulated personal time earned until such time is exhausted.

A medical leave begins on the first day your doctor certifies that you are unable to work and ends when your doctor certifies that you are able to return to work, or for a maximum period of 90 calendar days, whichever occurs first. An employee returning from a medical disability leave must present a doctor’s certificate showing fitness to return to work.

If returning from an approved, non-work-related medical leave, the employee may be offered the same position held at the time of leaving, if possible. If this position is not available, a reasonably comparable position may be offered. If neither the same nor a comparable position is available, an employee’s return to work will depend on job openings existing at the time of the scheduled return. There are no guarantees of reinstatement and returning to work will depend on the individual’s qualifications for existing openings.

2. Disability Leave

All employees should advise their supervisor and the CEO/Executive Director or equivalent management official of their need for disability leave as soon as possible in order to review the following:

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- If requested by the employee and recommended by the employee's physician, the employee's work assignment may be temporarily changed as required to protect the health and safety of the employee.
- Requests for transfers of job duties may be accommodated if the job and security rights of others are not violated.
- Temporary transfers due to health considerations will be granted where possible. However, in such instance, the employee will receive pay on the basis of the job performed.
- Disability leave will begin when ordered by the employee's physician.
- Leave returns will be only upon the presentation of a release by the physician.
- An employee will be allowed to utilize accrued personal time during disability leave.

3. Pregnancy Disability Leave

Leave Entitlement – Any employee who is actually disabled by pregnancy, childbirth, or a related medical condition is eligible for a Pregnancy Disability Leave of Absence. There is no length of service requirement.

For purposes of this policy, you are actually disabled when, in the opinion of your healthcare provider, you cannot work at all or are unable to perform any one or more of the essential functions of your job or to perform them without undue risk to yourself, the successful completion of your pregnancy, or to other persons as determined by a health care provider. This term also applies to severe morning sickness or if you need to take time off for prenatal care.

Advance Notice and Medical Certification

As a condition of a pregnancy disability leave of absence or a transfer, you must:

- Provide 30 days' advance notice before the leave of absence or transfer is to begin, if the need for the leave of absence or transfer is foreseeable, or when 30 days' notice is not foreseeable, as soon as practicable; and
- Provide a signed medical certification from your health care provider that states that you are disabled due to pregnancy or that it is medically advisable for you to be transferred to a less strenuous or hazardous position or to less strenuous or hazardous duties.

NAHAC may require you to provide a new certification if you request an extension of your leave of absence.

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Return to Work

If you and NAHAC have agreed upon a definite date of return from your leave of absence or transfer, you will be reinstated on that date if you notify NAHAC that you are able to return on that date. If the length of the leave of absence or transfer has not been established, or if it differs from the original agreement, you will be returned to work within two business days, where feasible, after you notify NAHAC of your readiness to return. Failure to return to work at the conclusion of the leave of absence may result in termination of employment.

Integration with Other Benefits

Pregnancy Disability Leaves of Absence are unpaid. You may elect to use accrued paid time off (PTO) during the unpaid leave of absence. However, use of paid time off will not extend the available leave of absence time. PTO hours will not accrue during any unpaid portion of the leave of absence, and you will not receive pay for official holidays that are observed during your leave of absence except during those periods when you are substituting PTO for unpaid leave.

Benefits

NAHAC will maintain group health insurance coverage for the duration of pregnancy disability leave up to a maximum of four months if such insurance was provided before the leave was taken and on the same terms as if the employee had continued to work.

An employee returning from a disability leave may be offered the same position held at the time of leaving, unless the job no longer exists, the job has been filled or if the employee is not capable of performing the job responsibilities.

If an employee is eligible for disability leave under federal and/or state laws, the Company will maintain group health insurance coverage for up to a maximum of 90 days (if such insurance was provided before the leave was taken) on the same terms as if the employee had continued to work.

Americans with Disabilities Act (ADA) and the ADA Amendments Act (ADAAA)

The Americans with Disabilities Act (ADA) and the Americans with Disabilities Amendments Act, known as the ADAAA, are federal laws that prohibit employers with 15 or more employees from discriminating against applicants and individuals with disabilities and that when needed provide reasonable accommodations to applicants and employees who are qualified for a job, with or without reasonable accommodations, so that they may perform the essential job duties of the position.

It is the policy of NAHAC to comply with all federal and state laws concerning the employment of persons with disabilities and to act in accordance with regulations and guidance issued by the Equal Employment Opportunity Commission (EEOC). Furthermore, it is our company policy not to discriminate against qualified individuals with disabilities in regard to application procedures, hiring,

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advancement, discharge, compensation, training or other terms, conditions and privileges of employment.

The company will reasonably accommodate qualified individuals with a disability so that they can perform the essential functions of a job unless doing so causes a direct threat to these individuals or others in the workplace and the threat cannot be eliminated by reasonable accommodation and/or if the accommodation creates an undue hardship to NAHAC. Contact corporate legal counsel with any questions or requests for accommodation.

Personal Time while on Leave

NAHAC requires an employee to utilize accrued PTO for disability leave. Employees on leave will not accrue PTO or other benefits.

4. Bereavement Leave

In the event of a death in your immediate family, you may request bereavement leave for up to five working days, with pay, to handle family affairs and attend any memorial services. Immediate family is defined as: father, mother, sister, brother, spouse, child, mother-in-law, father-in-law, grandparents, grandchildren, nieces, nephews, sisters-and-brothers-in-law, and domestic partners.

5. Personal Leave

A leave of absence without pay for up to 10 days may be granted at the discretion of the Company's Board of Directors. Requests for personal leave should be limited to unusual circumstances requiring an extended absence.

Employees are hereby notified that NAHAC does not guarantee reinstatement following a personal leave. However, the Company may offer employees returning from a personal leave of absence the same position or comparable position that the individual is qualified to perform, if a position is available.

6. Military Leave

NAHAC adheres to the "Uniformed Services Employment and Re-Employment Rights Act of 1994 (USERRA). Requests for information concerning a Military Leave should be made to the payroll manager.

7. Jury Duty or Witness Leave

NAHAC encourages employees to serve on jury or witness duty when called. The employee is responsible for notifying their supervisor of the need for time off for jury duty or witness duty as soon as notice or summons from the court or subpoena is received. Employees will receive full pay while serving for up to 5 days of jury or witness duty.

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8. Time Off for Voting

If an employee is unable to vote in a statewide public election before or after working hours, then time off may be requested to go to the polls. The Company will pay for up to two hours of absence from regularly scheduled work. Any additional time off will be without pay. Requests for voting time must be made in writing to the immediate supervisor.

9. Recreational Activities and Programs

NAHAC or its insurer will not be liable for the payments of workers' compensation benefits for any injury that arises out of the employee's voluntary participation in any off-duty recreational, social, or athletic activity that is not a part of the employee's work-related duties.

VI. PAYROLL/ACCOUNTING

A. Timekeeping Procedures

All employees are required to submit time sheets that document all hours worked and absent during the standard work schedule. Employees must submit time sheets that document full days of absence (Personal Days or Sick Time) during the standard work week. The employee must submit timesheets in accordance with timesheet submission deadlines to avoid delays in paycheck processing. Timesheet deadline is currently on Monday at 9:00 a.m. on payday week.

Any salaried employee is not required to clock in or out as they are set for a 40 hour work week automatically. If in the event the salaried employee takes PTO, then they will have to turn in the form to get approved and place it in the timekeeping system.

Time sheets will be approved by the individual supervisor or department manager in the absence of the supervisor.

B. Overtime

Overtime will be paid at one and one-half times the regular rate for non-exempt employees working more than 8 hours in any given day or more than 40 hours in a workweek. PTO, holidays, or unpaid absences are not considered time worked for overtime purposes.

Employees who anticipate the need for overtime to complete the week's work must notify the supervisor in advance and obtain approval before working hours that extend beyond their normal schedule.

During busy periods employees may be required to work extended hours.

***NOTE: All overtime must be authorized by a supervisor in advance.**



Employee Handbook

C. “Off-the-Clock” Work Prohibited

Nonexempt employees must report all time worked on their timesheet. Off-the-clock work is prohibited and failure to accurately record working time is grounds for discipline. Supervisors may not allow employees to engage in off-the-clock work.

D. Payment of Wages

All employees are paid bi-weekly.

E. Payroll Advances

NAHAC encourages employees to use their banking institutions or other sources whenever loans are needed. Any advance against future earnings will not be permitted.

F. Wage Garnishments

Garnishment of wages results when an unpaid creditor has taken the matter to court. A garnishment is legal permission for creditors to collect part of an employee’s pay directly from the Company. NAHAC is compelled by law to administer the court’s orders. In doing so, management will contact the employee to explain the details of the garnishment and how it affects wages. Employees are encouraged to resolve these matters privately to avoid the Company’s involvement. However, the Company will adhere to legally imposed wage assignments and garnishments, and will not modify the terms of those legal arrangements unless ordered by a court to do so.



Employee Handbook

ACKNOWLEDGMENT AND AGREEMENT

This is to acknowledge that I have received a copy of NAHAC's ("the Company") Employee Handbook and understand that it sets forth the terms and conditions of my employment as well as the duties, responsibilities, and obligations of my employment with NAHAC. I understand and agree that it is my responsibility to read the Employee Handbook and to abide by the rules, policies and standards set forth in the Employee Handbook.

I also acknowledge that my employment with NAHAC is not for a specified period of time and can be terminated at any time for any reason, with or without cause or notice, by me or by the Company. I acknowledge that no oral or written statements or representations regarding my employment can alter the foregoing. I also acknowledge that no supervisor or employee has the authority to enter into an employment – express or implied – providing for employment other than at-will.

I also acknowledge that, except for the policy of at-will employment, the Company reserves the right to revise, delete or add to the provisions of this Employee Handbook. All such revisions, deletions or additions, must be in writing and must be signed by the Chairman of the Board. No oral statements or representations can change the provisions of this Employee Handbook. I also acknowledge that, except for the policy of at-will employment, the terms and conditions of employment with the Company may be modified at the sole discretion of the Company with or without cause or notice at any time.

I understand that the foregoing agreement concerning my at-will employment status and the Company's right to determine and modify the terms and conditions of employment is the sole and entire agreement between me and NAHAC concerning the duration of my employment, the circumstances under which my employment may be terminated, and the circumstances under which the terms and conditions of my employment may change. I further understand that this agreement supersedes all prior agreements, understandings, and representations concerning my employment with NAHAC.

Employee Signature

Date

Employee Name [printed]

TO BE PLACED IN EMPLOYEE'S PERSONNEL FILE

BACKGROUND CHECKS

Policy Area: Payroll and Human Resources	Number: 500.C
Initial Effective Date: 12-19-2013	Initial Approved Date: 12-19-2013
Revised Policy Effective Date: 12-02-2019	Revision – Date Approved: 12-02-2019
Approved by: NAHAC Board of Directors	
<p>PURPOSE:</p> <p>NAHAC believes that hiring qualified individuals to fill positions contributes to the overall goals and strategic success of the Company. Background checks are an important tool for assuring a quality driven selection process. The Company will obtain applicant related information that helps determine the applicant’s overall employability, ensuring the protection of the Company’s employees, clients, property and information.</p> <p>POLICY:</p> <p>All offers of employment at NAHAC are contingent upon the favourable results of a background check. Background checks will be conducted on all newly hired staff members and on all employees and may also be done again on employees promoted to sensitive positions, if deemed necessary. NAHAC will use a third party agency to conduct a search of the applicant’s criminal history. Background checks for all employees will include:</p> <ul style="list-style-type: none"> • Multi-County Criminal • Federal Criminal History <p>Background checks for management positions will also include:</p> <ul style="list-style-type: none"> • Professional References <p>NAHAC will ensure that background checks are conducted in compliance with federal and state statutes.</p>	



NEVADA AFFORDABLE HOUSING ASSISTANCE CORPORATION

EMPLOYEE PERFORMANCE REVIEWS

Policy Area: Payroll and Human Resources	Number: 500.D
Initial Effective Date: 12-19-2013	Initial Approved Date: 12-19-2013
Revised Policy Effective Date: 12-02-2019	Revision – Date Approved: 12-02-2019
Approved by: NAHAC Board of Directors	
<p>PURPOSE:</p> <p>Performance evaluations can be an integral resource for assessing employees knowledge and abilities, and can help in determining if objectives of each job position are being met.</p> <p>POLICY:</p> <p>NAHAC Management will ensure that a timely and consistent employee performance review process is in place and followed accordingly. This will include pre-prepared performance review forms and appropriate approval levels.</p>	

Payroll and Time Tracking

Policy Area: Payroll and Human Resources	Number: 500.E
Initial Effective Date: 12-19-2013	Initial Approved Date: 12-19-2013
Revised Policy Effective Date: 12-02-2019	Revision – Date Approved: 12-02-2019
Approved by: NAHAC Board of Directors	
<p>PURPOSE:</p> <p>To ensure employees receive accurate and timely payment of compensation which is adequately supported by appropriate documentation, and which follows an appropriate control structure.</p> <p>POLICY:</p> <p>Employees are paid on a Bi-Weekly basis and will be processed through a third-party provider. For all hourly employees, time sheets shall be completed, reviewed, and approved to support all time spent on behalf of NAHAC. Employee time tracking shall be tracked to include time worked, holidays, leave taken, and benefits. All time shall be appropriately allocated to NAHAC programs based on actual time spent on each program. For salaried employees, time allocations shall be estimated based on a reasonable estimate of time spent based on industry standard estimation methods. Additions, deletions, or changes to the payroll or human resource related functions shall follow the guidelines established in the Payroll and HR authorization matrix.</p> <p>RESOURCES:</p> <p>Appendix VII – Authorization Matrix – Payroll and HR</p>	



NEVADA AFFORDABLE HOUSING ASSISTANCE CORPORATION

REPORTING OF WORKPLACE INJURY & ANNUAL SAFETY TRAINING

Policy Area: Payroll and Human Resources	Number: 500.F
Initial Effective Date: 09-02-2016	Initial Approved Date: 09-02-2016
Revised Policy Effective Date: 12-02-2019	Revision – Date Approved: 12-02-2019
Approved by: NAHAC Board of Directors	
<p>PURPOSE:</p> <p>NAHAC strives to provide a safe and secure working environment for all employees. However, when a work-related injury or illness occurs (i.e. injuries and illnesses that arise out of, or are incurred in the course of job-related activities on behalf of NAHAC), NAHAC shall provide appropriate medical care and treatment to the injured worker through its Workers' Compensation program. This policy applies to all employees and Board Members.</p> <p>POLICY:</p> <p>NAHAC will ensure that Reporting of Workplace Injury Notification exists which will, at a minimum, require any NAHAC Board Member or employee to disclose any possible injury in a timely manner and to provide employees and Board Members with appropriate steps to report an injury. NAHAC will ensure that the notification is kept up to date and that it is in compliance with applicable laws and regulations. In addition, employees should receive safety training at least annually and provide an acknowledgement of their understanding of the procedures for reporting workplace injuries.</p> <p>RESOURCES:</p> <p>Appendix VIII – Reporting Workplace Injury Notification and Acknowledgement</p>	

TELEWORKING – CONTRACTORS

Policy Area: Payroll and Human Resources	Number: 500.G
Initial Effective Date: 04-27-2020	Initial Approved Date: 04-27-2020
Approved by: NAHAC Board of Directors	
<p>PURPOSE:</p> <p>NAHAC does not control how and in what manner independent contractors perform work for NAHAC. Rather, NAHAC is only concerned with the outcome of the work for which the independent contractor is retained.</p> <p>While NAHAC does not seek to exert control over Contractor’s method of work, it remains imperative that NAHAC’s non-public, confidential, and otherwise sensitive data be preserved. For that reason, Contractor and NAHAC agree that during any period of time in which Contractor performs work away from NAHAC’s offices that involve access to or use of NAHAC computer systems or data (including non-public, confidential, and/or otherwise sensitive data), the following will apply.</p> <p><i>Workspace:</i></p> <p>It is NAHAC’s expectation that Contractor will implement whatever measures Contractor deems necessary to create an appropriate work environment that is maintained in a safe condition, free from hazards or other dangers to the person and to NAHAC equipment. Contractor agrees that Contractor alone bears the responsibility for determining what measures should be implemented to achieve a safe and appropriate work environment.</p> <p><i>Communication:</i></p> <p>During any periods in which NAHAC employees are working remotely due to an office closure, national pandemic, or other special circumstance, NAHAC requests that any communications that are necessary for Contractor to perform the services for which Contract was retained (“Services”) occur via electronic meetings and telephone conferences in lieu of in-person meetings.</p> <p><i>Equipment and Other Resources:</i></p> <p>While it generally expected that Contractor will provide Contractor’s own equipment in performing the Services, in the event that equipment or other resources are provided by NAHAC (“NAHAC Resources”), these NAHAC Resources are to be used for NAHAC business purposes only. NAHAC Resources should not be made accessible to third parties. Anyone to whom NAHAC grants access to NAHAC Resources is expected to demonstrate proper care when using NAHAC Resources. If NAHAC Resources are lost, broken, or damaged in any way, this should be reported to NAHAC immediately. Upon termination of Contractor’s Services, all NAHAC Resources, as well as any company data, information, and/or other property of NAHAC, must be returned to NAHAC immediately, unless other arrangements have been made.</p>	



NEVADA AFFORDABLE HOUSING ASSISTANCE CORPORATION

Security and Data Protection:

Contractor is expected to ensure the protection of non-public NAHAC information while telecommuting. While it is Contractor's responsibility to determine what specific measures are necessary to ensure the protection of such information, in general, such security measures should include the use of physical locks to secure the workspace (where possible), regular password maintenance, standards for the transmission of public, sensitive, and private data as outlined in Section 2 (Asset Protection) of NAHAC's Information Security and Safeguards Program ("ISSP"), and any other measures appropriate for the environment. Additionally, Contractors should conduct themselves in a manner that is consistent with the NAHAC policy for the acceptable use of NAHAC information assets in their care, as outlined in Section 5 (Acceptable Use) of the ISSP. Data should not be shared and should be safeguarded from outside sources, including family and friends. Contractor is encouraged to refer to the ISSP for additional information regarding the security and protection of information.



NEVADA AFFORDABLE HOUSING ASSISTANCE CORPORATION

TELEWORKING – EMPLOYEES AND TEMPORARY WORKERS

Policy Area: Payroll and Human Resources	Number: 500.G
Initial Effective Date: 04-27-2020	Initial Approved Date: 04-27-2020
Approved by: NAHAC Board of Directors	
<p>PURPOSE:</p> <p>To provide for a work arrangement that allows NAHAC employees and temporary workers to work from home for all or some of their regularly scheduled work hours. Although not all jobs can be performed satisfactorily from other locations, NAHAC recognizes that, in some cases, telecommuting arrangements can provide a mutually beneficial option for NAHAC and its employees.</p> <p>POLICY:</p> <p>It is the policy of NAHAC to allow employees and temporary workers to telework on a temporary or permanent basis at the discretion of the CEO/Executive Director, or equivalent management official. Such arrangements should be for a valid business purpose, including local or national emergencies, inclement weather, medical purposes, or other purposes as approved by the CEO/Executive Director, or equivalent management official. In the absence of the CEO/Executive Director, such arrangements should be approved by the Board Chair. All telework arrangements should adhere to the following guidelines:</p> <p><i>Compensation and Work Hours:</i></p> <p>Compensation, benefits, work status, work responsibilities, or amount of time expected to be worked each day or pay period will not change due to participation in a telework arrangement. Employees are expected to work during their normal scheduled work hours. Any deviations from normal scheduled work hours should be approved by the CEO/Executive Director, or equivalent management official. Exempt salaried employees are expected to continue to dedicate the amount of hours that, in their judgment, is necessary to ensure that all job duties are fulfilled. This may, for example, require that such employees work outside of normal work hours. Hourly employees and temporary workers must send an email to all personnel for the times they start and stop working, including any breaks in work hours. For non-exempt employees, all time spent working should be recorded on time cards, and conversely, time spent on non-work related matters should not be recorded or claimed as working time.</p> <p><i>Workspace:</i></p> <p>Employees and temporary workers should establish an appropriate remote work environment that is free from distraction, as far as possible, and dedicate their full attention during normal scheduled work hours. The remote workspace should be maintained in a safe condition, free from hazards or other dangers to the person and to NAHAC equipment.</p>	



NEVADA AFFORDABLE HOUSING ASSISTANCE CORPORATION

Communication:

Absent special circumstances, in person meetings are to be replaced with electronic meetings and telephone conferences. All email correspondence (both internal and external) should include (via CC) the person's direct supervisor and CEO/Executive Director, or equivalent management official, as directed. All employees and temporary workers should have a phone call at least daily with their direct supervisor or the CEO/Executive Director.

Equipment and Other Resources:

The company will provide specific equipment and other resources for those who are teleworking to perform their current duties, as determined by the CEO/Executive Director, or equivalent management official. This equipment and other resources may include hardware, computer software, email, connectivity to host applications, and other applicable equipment or supplies, as deemed necessary by management. These resources are to be used for NAHAC business purposes only, and access to such resources should be limited to use by the designated individual. Personal devices or accounts should not be used to conduct NAHAC business, or access or store non-public NAHAC data, unless authorized in writing by the CEO/Executive Director, or equivalent management official. NAHAC resources should not be made accessible to others not employed or expressly authorized by NAHAC. Individuals who are teleworking are expected to demonstrate proper care when using NAHAC equipment and other resources. If equipment or other resources are lost, broken, or damaged in any way, it should be reported to management immediately. Upon termination of employment, all company data, information, and property must be returned to the company immediately, unless other arrangements have been made. Individuals should refer to the Employee Handbook for additional information regarding use of NAHAC property and other resources.

Security and Data Protection:

Consistent with the expectations of information security for employees and temporary workers working at the office, telecommuting employees will be expected to ensure the protection of non-public information while telecommuting. Such security measures should include the use of physical locks to secure the remote workspace (where possible), regular password maintenance, standards for the transmission of public, sensitive, and private data as outlined in Section 2 (Asset Protection) of the Information Security and Safeguards Program ("ISSP"), and any other measures appropriate for the environment. Additionally, telecommuting employees must adhere to the NAHAC policy for the acceptable use of NAHAC information assets in their care as outlined in Section 5 (Acceptable Use) of the ISSP. Data should not be shared and should be safeguarded from outside sources, including family and friends. Employees and temporary workers should refer to the ISSP for additional information regarding the security and protection of information.

**AMENDED AND RESTATED BYLAWS
OF THE NEVADA AFFORDABLE HOUSING
ASSISTANCE CORPORATION
(As Amended Through December 20, 2018)**

These Amended and Restated Bylaws of the Nevada Affordable Housing Assistance Corporation, a Nevada non-profit corporation (the “Corporation”) amend and restate in their entirety the Bylaws of the Corporation entitled the “Amended and Restated Bylaws of the Nevada Affordable Housing Assistance Corporation (As Amended Through March 7, 2018).”

**ARTICLE 1
ORGANIZATION**

Section 1.1 Name. The name of the Corporation is the NEVADA AFFORDABLE HOUSING ASSISTANCE CORPORATION.

Section 1.2 Registered Office and Resident Agent. The Corporation’s registered agent and registered office location are as follows: Christopher Byrd, 300 So. 4th Street #1400, Las Vegas, Nevada 89101. The Corporation’s registered agent and registered office may be changed by resolution of the Board.

Section 1.3 Principal Business Office and Other Offices. The principal business office of the Corporation is located at 3016 W. Charleston Boulevard, Suite 160, Las Vegas, Nevada 89102. The Board may change the location of the principal business office of the Corporation and the Board may also establish branch or subordinate offices.

Section 1.4 Seal. The Corporation will not utilize a seal.

Section 1.5 Fiscal Year. The fiscal year of the Corporation shall begin on July 1st and end on June 30th of each year.

**ARTICLE 2
MEMBERS**

Section 2.1 Members. This Corporation shall have no members.

**ARTICLE 3
THE BOARD**

Section 3.1 Board Constitution, Selection Process and Term of Office.

(a) The Board shall consist of five (5) members (individually a “Board Member” and collectively the “Board Members”) with additional non-voting seats on the Board for the then Chief Operating Officer and Executive Director of the Corporation (the “Non-Voting Members”). All of the Board Members shall be residents of Nevada. Two (2) Board Members (the “Housing Division Directors”) will be appointed by the Administrator (the “Administrator”)

of the Housing Division of the Nevada Department of Business and Industry. One (1) Board Member (the “B&I Director”) shall be appointed by the Director (the “Head of B&I”) of the Nevada Department of Business & Industry. Two (2) Board Members will be Independent Directors. The Independent Directors shall be persons who are not employees or representatives of the State of Nevada. The Independent Directors shall be persons who have experience with real estate, housing, mortgage lending or some other expertise related to mortgage assistance programs or sustainable housing. Independent Directors may not: (i) personally benefit from any Program administered by the Corporation; (ii) be employed by, or have an ownership interest in (other than ownership of the stock of a publically traded company in a mutual fund or other retirement account) an organization which has a contract to provide services to the Corporation; and (iii) be employed by, or have an ownership interest in (other than the ownership of stock of a publically traded company in a mutual fund or other retirement account) an organization that participates in a Program or Programs administered by the Corporation or which receives any sort of funding from the Corporation, including through the Programs that the Corporation administers. The Independent Directors may not be related by blood or marriage/domestic partnership within the second degree of consanguinity or affinity.

One of the Housing Division Directors shall serve as the Chairperson of the Board and the Corporation’s President, as elected by the Board. One of the Independent Directors shall serve as the Vice-Chairperson and Vice President of the Corporation as elected by the Board. The Chairperson/President may delegate one or more responsibilities to the Vice-Chairperson/Vice-President.

Unless earlier removed as provided in these Bylaws, all of the Members of the Board serve for a two (2) year term (each a “Service Term”) and may serve terms in succession. There shall be no limits on the number of consecutive terms any Member of the Board of Directors may serve on the Board of Directors.

(b) Selection, Vacancies & Removal.

The initial Independent Directors were seated as of the initial adoption date of these Bylaws. Independent Directors shall be elected by the remaining Independent Director, although less than a quorum, when their terms expire. Candidates to serve as Independent Directors may be nominated by then seated Independent Directors the Corporation’s

COO or the Corporation’s Executive Director. When selecting Independent Directors, an analysis of the independence of directors and their skills and expertise shall be performed by the remaining Independent Director with input from the COO, Executive Director and legal counsel for the Corporation. This should include consideration of the following characteristics of the proposed Independent Director: diversity; skills; integrity and moral responsibility; capacity to evaluate strategy and reach sound conclusions; and availability of time to do justice to duties as a director and willingness to devote the time required. An Independent Director may be removed at any time, with or without cause, by a majority vote.

The Housing Division Directors shall be appointed by the Administrator and the B&I Director by the Head of B&I when such Director’s term expires. Such appointment may be accomplished by the delivery of written notification from the Administrator or Head of B&I, as applicable, (the “Appointment Notice”), which shall be filed in the minute books of the

Corporation and such appointment shall be effective as of the specified future date in the Appointment Notice or if no date is specified the date of receipt by the Corporation of the Appointment Notice.

The Housing Division Directors serve at the pleasure of the Administrator and may be removed from office by the Administrator at any time with or without cause. The removal of a Housing Division Director may be accomplished by the delivery of written notification from the Administrator (the "Removal Notice") which shall be filed in the minute books of the Corporation and such removal shall be effective as of the specified future date in the Removal Notice or if no date is specified the date of receipt by the Corporation of the Removal Notice.

The B&I Director serves at the pleasure of the Head of B&I and may be removed from office by the Head of B&I at any time with or without cause. The removal of a Housing Division Director may be accomplished by the delivery of written notification from the Administrator (the "Removal Notice") which shall be filed in the minute books of the Corporation and such removal shall be effective as of the specified future date in the Removal Notice or if no date is specified the date of receipt by the Corporation of the Removal Notice.

No reduction of the authorized number of Board Members or any other action not specified in these Bylaws shall have the effect of removing any Board Member before that person's term of office expires.

Subject to applicable law, any Board Member may resign effective upon giving written notice to either the Chairman of the Board, the Secretary, or the Board, unless the notice specifies a later time for the effectiveness of such resignation. If the resignation is effective at a future time, a successor may be selected before such time, to take office when the resignation becomes effective.

A vacancy or vacancies in the Board shall be deemed to exist in case of the death, resignation, or removal of any Board Member or if the authorized number of Board Members is increased.

The Board may declare vacant the office of a Board Member who has been declared of unsound mind by a final order of court, or convicted of a felony, or found by a final order of judgment of any court to have breached any duty arising under NRS Chapter 82.

(c) *Fees and Compensation.* The Independent Directors shall receive \$100.00 per month or \$80.00 for each meeting attended in the month, whichever is greater, for their services as Board Members. Additionally, the Independent Directors shall receive reimbursement for Board travel for official business duly approved by the majority of the Board that is accordance with the Corporation's travel policy.

(d) *Committees.* The Board may appoint one or more committees in accordance with NRS Section 82.206, each consisting of at least one (1) Board Member and such other natural persons who need not be Board Members upon approval of the Board. Any such

committee shall have and may exercise the powers of the Board to the extent approved by the Board Members and permitted under NRS Section 82.206.

Section 3.2 Powers of the Board.

3.2.1 *General Powers.* Subject to limitations of the Articles of Incorporation and these Bylaws, the activities and affairs of the Corporation shall be conducted and all corporate powers shall be exercised by or under the direction of the Board. The Board may delegate the management of the activities of the Corporation to any person or persons, a management company, or committees, however composed, provided that the activities and affairs of the Corporation shall be managed and all corporate powers shall be exercised under the ultimate direction of the Board. Without prejudice to such general powers, but subject to the same limitations, it is hereby expressly declared that the Board shall have the following powers in addition to the other powers enumerated in these Bylaws or statute:

(a) To select and remove all the other officers, agents, and employees of the Corporation, prescribe powers and duties for them as may not be inconsistent with law, the Articles of Incorporation, or these Bylaws, fix their compensation, and require from them security for faithful service.

(b) To conduct, manage, and control the affairs and activities of the Corporation and to make such rules and regulations therefor not inconsistent with law, the Articles of Incorporation, or these Bylaws, as they may deem best.

(c) To borrow money and incur indebtedness for the purposes of the Corporation, and to cause to be executed and delivered therefor, in the Corporate name, promissory notes, bonds, debentures, deeds of trust, mortgages, pledges, hypothecations, or other evidences of debt and securities therefor.

(d) To carry on a business at a profit and apply any profit that results from the business activity to any activity in which it may lawfully engage as a tax exempt corporation. No part of such profits shall inure to the benefit of any of its Board Members, trustees, officers, or to individuals.

(e) To promote the development and operation of affordable housing and to stabilize the housing market in the State of Nevada.

(f) To provide housing assistance to targeted groups of qualified skilled workers and service personnel when a lack of affordable housing for such workers is identified and determined to be necessary or beneficial to the citizens of the State of Nevada.

(g) To provide loans and/or grants to finance and subsidize affordable housing in the State of Nevada and support programs to retain homes in Nevada.

(h) To acquire, preserve, rehabilitate, construct and manage affordable housing projects in the State of Nevada.

(i) To create subsidiary entities or organizations consistent with the purposes of the Corporation.

(j) To apply for and receive grants from governmental authorities and agencies in connection with affordable housing, assistance to homeowners or any other purpose deemed by the Board to be consistent with the purposes of the Corporation.

(k) To administer programs associated with affordable housing, prevention of homelessness, neighborhood stabilization, homeowner assistance and such other programs determined by the Board to be consistent with the purpose of the Corporation.

(l) To modify the programs and/or purposes of the Corporation as the Board sees fit so long as the Corporation's tax exempt status and primary purpose set forth in Article V of the Articles of Incorporation is not adversely affected.

(m) To carry on such business and activities as the Board deems consistent with the purposes and objectives of the Corporation set forth in its Articles of Incorporation and these Bylaws.

3.2.2 Powers Related to Programs. In addition to the General Powers listed in Section 3.2.1 above, the Board shall have the following additional powers and roles in connection with the administration of the Corporation's programs:

(a) To ensure that program funds are spent in a manner to maximize returns on investment.

(b) To act as the appeal board to the stakeholders of the program.

(c) Overall program oversight.

(d) To ensure that the program is at all times in full compliance with all applicable laws and regulations.

(e) To oversee program marketing initiatives.

(f) To monitor, manage and control cash flow.

(g) To perform, or cause to be performed, any other lawful act which is in furtherance of the purposes of the Corporation or to facilitate the administration of its programs.

Section 3.3 Meetings of the Board.

(a) *Annual Meeting.* The annual meeting of the Board shall be at such place as may be provided in a notice thereof. The Board shall meet each year for the purpose of organization, election of officers, and consideration of any other business that may properly be brought before the meeting.

(b) *Regular Meetings.* Regular meetings of the Board shall be held at the times and places within or without the State of Nevada as may be designated from time to time by resolution of the Board or by written consent of all Board Members.

(c) *Special Meetings.* Special meetings of the Board for any purpose or purposes may be held at any time upon call by any Board Member or the Chairman of the Board. The other meetings may be held at any place within or without the State of Nevada as may be designated from time to time by resolution of the Board or by written consent of all Board Members.

(d) *Manner of Notice of Regular and Special Meetings.* Written notice of the time and place of regular and special meetings of the Board shall be delivered personally or sent to each Board Member by mail, email, fax or other form of written communication, addressed to the Board Member at the Board Member's address as it is shown upon the records of the Corporation or, if it is not so shown on the Corporation's records or is not readily ascertainable, at the place in which the meetings of the Board are regularly held. In case the notice is mailed, it shall be deposited in the United States mail, postage prepaid, in the place in which the principal business office of the Corporation is located at least seventy-two (72) hours prior to the time of the holding of the meeting. In case the notice is delivered personally, emailed or faxed as above provided, it shall be so delivered at least twenty-four (24) hours prior to the time of the holding of the meeting. The mailing, email, faxing or personal delivery as above provided shall constitute due, legal and personal notice to the Board Member.

(e) *Notice of Adjourned Meetings.* Notice of the time and place of holding an adjourned meeting need not be given to absent Board Members if the time and place be fixed at the meeting adjourned.

(f) *Entry of Notice.* An entry in the minutes of any regular or special meeting of the Board to the effect that notice has been duly given shall be conclusive and incontrovertible evidence that due notice of the special meeting was given to all Board Members as required by law and by these Bylaws.

(g) *Participation in Meetings by Conference Telephone.* Board Members may participate in a meeting through use of conference telephone or similar communications equipment, so long as all Board Members participating in such meeting can hear one another.

(h) *Waiver of Notice.* The transactions of any meeting of the Board, however called and noticed or wherever held, shall be as valid as though had at a meeting duly held after regular call and notice, if a quorum be present, and if, either before or after the meeting, each of the Board Members not present signs a written waiver of notice or a consent to the holding of the meeting or an approval of the minutes thereof. All such waivers, consents or approvals shall be filed with the corporate records or made a part of the minutes of the meeting.

(i) *Quorum.* A majority of the authorized number of Board Members shall be necessary to constitute a quorum for the transaction of business, except to adjourn as hereinafter provided. Every act or decision done or made by a majority of the Board Members

present at a meeting duly held at which a quorum is present shall be regarded as the act of the Board unless a greater number be required by the Articles of Incorporation, these Bylaws or applicable law. If the number of Board Members is one or two, the unanimous consent of the Board Members shall be necessary for Board's action.

(j) *Adjournment.* A quorum of the Board Members may adjourn any Board meeting to meet again at a stated day and hour; provided, however, that in the absence of a quorum, a majority of the Board Members present at any Board meeting either regular or special, may adjourn from time to time until the time fixed for the next regular meeting of the Board.

(k) *Application of Nevada Revised Statutes Chapter 241.* All meetings of the Board must comply with the provisions of the Nevada Open Meeting Law, Chapter 241 of the Nevada Revised Statutes.

ARTICLE 4 THE OFFICERS

Section 4.1 Officers and Subordinate Officers During Tenure of Board. After the commencement of the tenure of the Board, the officers of the Corporation shall be a Chairman of the Board, a Vice Chairman of the Board, a Secretary, and a Treasurer. The Chairman of the Board shall also serve as the President of the Corporation. The Secretary and the Treasurer of the Corporation, and any other officers of the Corporation selected by the Board, may, but are not required to be, members of the Board.

Any number of offices may be held by the same person, except as provided in the Articles of Incorporation or in these Bylaws and except that neither the Secretary nor the Treasurer may serve concurrently as the Chairman of the Board/President.

The Secretary and Treasurer shall be chosen annually by the Board when their respective terms expire, and each shall serve at the pleasure of the Board, subject to the rights, if any, of an officer under any contract of employment. Unless earlier removed as provided hereunder, the Secretary and the Treasurer shall hold office for two (2) years and until a successor has been elected. There shall be no limits on the number of consecutive full or partial terms the Secretary or Treasurer may serve.

The Board Members may appoint, and may authorize the Chairman of the Board or another officer to appoint, any other officers the business of the Corporation may require, each of whom shall have the title, hold office for the period, have the authority, and perform the duties specified in the Bylaws or determined from time to time by the Board Members. The removal of a subordinate officer is subject to the rights, if any, of such subordinate officer under any contract of employment.

Section 4.2 Provisions Regarding Officers Applicable During Tenure of Board.

(a) (Removal, Resignation and Vacancies.

(i) *Removal.* Any officer may be removed at any time, with or without cause, by the Board. The Board shall give written notice of removal to the officer to be removed with copies to the Corporation and the Board Members.

Any such removal shall be without prejudice to the rights, if any, of the officer under any contract of employment of the officer.

(ii) *Resignation.* Any officer may resign at any time by giving written notice to the Corporation with copies to the Board Members. Any resignation shall take effect on the effective date set forth in the notice. If no effective date is specified in the notice of resignation, the resignation is effective on the date the notice is received by the Corporation. Unless otherwise specified in that notice, the acceptance of the resignation shall not be necessary to make it effective. Any resignation is without prejudice to the rights, if any, of the Corporation under any contract to which the resigning officer is a party.

(iii) *Vacancies.* A vacancy in any office because of death, resignation, removal, disqualification, or any other cause shall be filled only in the manner prescribed in these Bylaws for regular election or appointment to that office, provided that such vacancies shall be filled as they occur and not on an annual basis.

(b) General Responsibilities of the Officers of the Corporation.

(i) *Chairman of the Board/President.* The Chairman of the Board shall preside at meetings of the Board and exercise and perform such other powers and duties as may be from time to time assigned to him by the Board or prescribed by the Bylaws. The Chairman of the Board shall also serve as President of the Corporation and is authorized to officiate and perform such duties which are commensurate with that of a Chief Executive Officer of an organization.

(ii) *Vice-Chairman of the Board.* In the absence or disability of the Chairman of the Board/President, the Vice-Chairman shall perform all the duties of the Chairman of the Board/President, and when so acting shall have all the powers of, and be subject to all the restrictions upon the Chairman of the Board/President. The Vice-Chairman of the Board shall have such other powers and perform such other duties as from time to time may be prescribed for them respectively by the Chairman of the Board or the Board.

(iii) *Secretary.* The Secretary shall attend to the following:

(1) Book of minutes. The Secretary shall keep or cause to be kept, at the principal executive office or such other place as the Board may direct, a book of minutes of all meetings and actions of the Board, and committees of the Board, with the time and place of holding, whether regular or special, and, if special, how authorized, the notice given, the names of those present at such meetings, and the proceedings of such meetings.

(2) Notices and other duties. The Secretary shall give, or cause to be given, notice of all meetings of the Board required by the Bylaws to be given. The

Secretary shall have such other powers and perform such other duties as may be prescribed by the Board or the Bylaws.

(iv) *Treasurer.* The Treasurer shall attend to the following:

(1) Books of account. The Treasurer shall keep and maintain, or cause to be kept and maintained, adequate and correct books and records of accounts of the properties and business transactions of the Corporation, including accounts of its assets, liabilities, receipts, disbursements, gains, losses, capital, retained earnings, and other matters customarily included in financial statements. The books of account shall be open to inspection by any Board Member at all reasonable times.

(2) Deposit and disbursement of money and valuables. The Treasurer shall disburse, or cause to be disbursed, the funds of the Corporation as may be ordered by the Board; shall render to the Board Members, whenever they request it, an account of all transactions and of the financial condition of the Corporation; In the absence or disability of both the Chairman of the Board/President, and the Vice-Chairman of the Board, the Treasurer shall perform all of the duties of the Chairman of the Board/President, and when so acting shall have all the powers of, and be subject to all the restrictions upon the Chairman of the Board/President; and shall have such other powers and perform such other duties as may be prescribed by the Board or the Bylaws.

(c) Compensation. Officers may receive such compensation, if any, for their services, and such reimbursement for expenses, as may be fixed or determined by the Board.

ARTICLE 5 MISCELLANEOUS

Section 5.1 Corporate Records. The Corporation shall keep:

- (a) Adequate and correct books and records of accounts;
- (b) Written minutes of the proceedings of its Board and its committees;

and

(c) The original or a copy of the Articles of Incorporation and Bylaws, as amended, to date.

Section 5.2 Annual Reports.

(a) Financial statements shall be prepared as soon as reasonably practicable after the close of the fiscal year. The financial statements shall contain in appropriate detail the following:

(i) The assets and liabilities, including trust funds, of the Corporation as of the end of the fiscal year;

(ii) The principal changes in assets and liabilities, including trust funds, during the fiscal year;

(iii) The revenue or receipts of the Corporation, both unrestricted and restricted to particular purposes, for the fiscal year;

(iv) The expenses or disbursements of the Corporation, for both general and restricted purposes during the fiscal year; and

(v) The amount and circumstances of any indemnification paid during the fiscal year to any officer or Board Member of the Corporation.

(b) Such financial statements shall be accompanied by any report thereon of independent accountants, or, if there is no such report, the certificate of an authorized officer of the Corporation that such statements were prepared without audit from the books and records of the Corporation.

(c) A report including the financial statements prescribed above shall be furnished annually to all Members of the Board and various stakeholders.

Section 5.3 Checks, Drafts, etc. All checks, drafts, bonds, bills of exchange, or other orders for payment of money, notes, or other evidences of indebtedness issued in the name of or payable to the Corporation shall be signed or endorsed by such person or persons and in such manner as, from time to time, shall be determined by resolution of the Board.

Section 5.4 Contracts, etc., How Executed. Unless otherwise specifically determined by the Board or otherwise required by law, formal contracts, promissory notes and other evidences of indebtedness, deeds of trust, mortgages and other real estate documents, grants, and other documents of any kind required to be executed by, for or on behalf the Corporation, shall be executed by the Chairman of the Board and by either the Secretary or the Treasurer. No officer, agent or employee shall have any power or authority to bind the Corporation by any contract or engagement or to pledge its credit to render it liable for any purpose or to any amount except as specifically authorized in these Bylaws or by the Board in accordance with these Bylaws.

Section 5.5 Representation of Shares of Other Corporations. The Chairman of the Board and the Secretary of the Corporation are authorized to vote, represent and exercise on behalf of the Corporation all rights incident to any and all shares of any other corporation or corporations standing in the name of the Corporation. The authority herein granted to these officers to vote or represent on behalf of the Corporation any and all shares held by the Corporation in any other corporation or corporations may be exercised either by these officers in person or by any persons authorized so to do by proxy or power of attorney duly executed by these officers.

Section 5.6 Inspection of Bylaws. The Corporation shall keep in its registered office for the transaction of business the original or a copy of the Bylaws as amended or otherwise altered to date, certified by the Secretary, which shall be open to inspection by the Board Members at all reasonable times during office hours.

Section 5.7 Exempt Activities Limitation. Notwithstanding any other provision of these Bylaws, no Director, Officer, employee or representative of this Corporation shall take any action or undertake any activity by or on behalf of the Corporation not permitted to be taken or carried on by an organization exempt under Section 501(c)(3) of the 1986 Internal Revenue Code as it now exists or may be amended or by any organization contributions to which are deductible under Section 170(c)(2) the 1986 Internal Revenue Code as it now exists or may be amended. NO part of the earnings of the Corporation shall inure to the benefit of or be distributable to any Officer, Director or other private person, except that the Corporation shall be authorized and empowered to pay reasonable compensation for services rendered and to make payments and distributions in furtherance of the purposes of the Corporation set forth herein and in its Articles of Incorporation, as amended from time to time.

ARTICLE 6 INDEMNIFICATION

Section 6.1 Indemnification of Board Members and Officers.

(a) The Corporation shall indemnify any person who was, or is, a party, or is threatened to be made a party, to any threatened, pending or completed action, suit or proceeding, whether civil, criminal, administrative or investigative (other than an action by or in the right of the Corporation) by reason of the fact that the person is, or was, a Board Member, officer, employee or agent of the Corporation, or is, or was, serving at the request of the Corporation as a Board Member, officer, employee or agent of another corporation, partnership, joint venture, trust or other enterprise, against expenses, including attorneys' fees, judgments, fines and amounts paid or owed in settlement actually and reasonably paid or incurred by the person or rendered or levied against the person in connection with such action, suit or proceeding if the person acted in good faith and in a manner the person reasonably believed to be in or not opposed to the best interests of the Corporation, and with respect to any criminal action or proceeding, had no reasonable cause to believe the person's conduct was unlawful. The termination of any action, suit or proceeding by judgment, order, settlement, conviction, or upon a plea of nolo contendere or its equivalent, shall not, of itself, create a presumption that the person did not act in good faith and in a manner which the person reasonably believed to be in or not opposed to the best interests of the Corporation, or, with respect to any criminal action or proceeding, had reasonable cause to believe that the person's conduct was unlawful.

(b) The Corporation may indemnify any person who was, or is, a party, or is threatened to be made a party, to any threatened, pending or completed action or suit by or in the right of the Corporation to procure a judgment in its favor by reason of the fact that the person is, or was, a Board Member, officer, employee or agent of the Corporation, or is, or was, serving at the request of the Corporation as a Board Member, officer, employee or agent of another corporation, partnership, joint venture, trust or other enterprise against expenses,

including attorneys' fees, actually and reasonably paid or incurred by the person in connection with the defense or settlement of such action or suit if the person acted in good faith and in a manner he reasonably believed to be in or not opposed to the best interests of the Corporation, provided, however, that no indemnification shall be made in respect of any claim, issue or matter as to which such person shall have been adjudged to be liable for misfeasance or nonfeasance in the performance of the person's duty to the Corporation unless and only to the extent that, despite the adjudication of liability but in view of all circumstances of the case, such person fairly and equitably merits indemnification.

(c) To the extent that a person who may be entitled to indemnification by the Corporation under this section is, or has been, successful on the merits or otherwise in defense of any action, suit or proceeding referred to in subsections (a) and (b), or in defense of any claim, issue or matter therein, the person shall be indemnified against expenses, including attorney's fees, actually and reasonably paid or incurred by the person in connection therewith.

(d) Any indemnification under subsections (a) and (b) shall be made by the Corporation only as authorized in the specific case upon a determination that indemnification of the Board Member, officer, employee or agent is proper in the circumstances because the person has met the applicable standard of conduct set forth in subsection (a) or (b). Such determination shall be made (i) by the Board by a majority vote of a quorum consisting of Board Members who were not parties to such action, suit or proceeding, or (ii) if required by law, by the court in which such action, suit or proceeding was brought or another court of competent jurisdiction.

(e) Expenses incurred in defending a civil or criminal action, suit or proceeding may be paid by the Corporation in advance of the final disposition of such action, suit or proceeding if such payment is authorized in the manner provided in subsection (d) upon receipt of an undertaking by or on behalf of the Board Member, officer, employee or agent to repay such amount unless it shall ultimately be determined that the person is entitled to be indemnified by the Corporation as authorized in this section.

(f) The indemnification provided by this section shall not be deemed exclusive of any other rights to which those seeking indemnification may be entitled under any bylaw, agreement, vote of disinterested Board Members or otherwise, both as to action in the person's official capacity and as to action in another capacity while holding such office, shall continue as to a person who has ceased to be a Board Member, officer, employee or agent and shall inure to the benefit of the heirs, executors and administrators of such person.

(g) The Corporation shall have power to purchase and maintain insurance on behalf of any person who is or was a Board Member, officer, employee or agent of the Corporation, or is or was serving at the request of the Corporation as a Board Member, officer, employee or agent of another corporation, partnership, joint venture, trust or other enterprise against any liability asserted against the person and incurred by the person in any such capacity, or arising out of the person's status as such, whether or not the Corporation would have the power to indemnify the person against such liability under the provisions of this section.

(h) For the purposes of this section, references to "the Corporation" include all constituent corporations absorbed in a consolidation or merger as well as the resulting or surviving corporation so that any person who is, or was, a Board Member, officer, employee or agent of such a constituent corporation or is, or was, serving at the request of such constituent corporation as a Board Member, officer, employee or agent of another corporation, partnership, joint venture, trust or other enterprise shall stand in the same position under the provisions of this section with respect to the resulting or surviving corporation as the person would if the person had served the resulting or surviving corporation in the same capacity.

(i) The provisions of this section shall apply to the estate, executors, administrators, heirs, legatees or devisees of a person entitled to indemnification hereunder and the term "person," where used in the section shall include the estate, executors, administrators, heirs, legatees or devisees of such person.

ARTICLE 7 CONFLICTS OF INTEREST

Section 7.1 Purpose. The purpose of the conflict of interest policy is to protect the Corporation's tax-exempt interest when it is contemplating entering into a transaction or arrangement that might benefit the private interest of an Officer or Member of the Board of Directors of the Corporation or which might result in a possible excess benefit transaction. This policy is intended to supplement but not replace any applicable state and federal laws governing conflict of interest applicable to nonprofit and charitable organizations.

Section 7.2 Definitions.

(a) *Interested Person*. Any Director, principal Officer, or Member of a Committee with governing Board delegated powers, who has a direct or indirect financial interest, as defined in subsection (b) below, is an interested person.

(b) *Financial Interest*. A person has a financial interest if the person has, directly or indirectly, through business, investment, or family:

(i) An ownership or investment interest in any entity with which the Corporation has a transaction or arrangement,

(ii) A compensation arrangement with the Corporation or with any entity or individual with which the Corporation has a transaction or arrangement, or

(iii) A potential ownership or investment interest in, or compensation arrangement with, any entity or individual with which the Corporation is negotiating a transaction or arrangement.

Compensation includes direct and indirect remuneration as well as gifts or favors that are not insubstantial.

A financial interest is not necessarily a conflict of interest. Under Section 7.3(b), a person who has a financial interest may have a conflict of interest only if the appropriate governing board or committee decides that a conflict of interest exists.

Section 7.3 Procedures.

(a) *Duty to Disclose.* In connection with any actual or possible conflict of interest, an interested person must disclose the existence of the financial interest and be given the opportunity to disclose all material facts to the directors and members of committees with governing board delegated powers considering the proposed transaction or arrangement.

(b) *Determining Whether a Conflict of Interest Exists.* After disclosure of the financial interest and all material facts, and after any discussion with the interested person, he/she shall leave the governing board or committee meeting while the determination of a conflict of interest is discussed and voted upon. The remaining board or committee members shall decide if a conflict of interest exists.

(c) Procedures for Addressing the Conflict of Interest.

(i) An interested person may make a presentation at the governing board or committee meeting, but after the presentation, he/she shall leave the meeting during the discussion of, and the vote on, the transaction or arrangement involving the possible conflict of interest.

(ii) The chairperson of the governing board or committee shall, if appropriate, appoint a disinterested person or committee to investigate alternatives to the proposed transaction or arrangement.

(iii) After exercising due diligence, the governing board or committee shall determine whether the Corporation can obtain with reasonable efforts a more advantageous transaction or arrangement from a person or entity that would not give rise to a conflict of interest.

(iv) If a more advantageous transaction or arrangement is not reasonably possible under circumstances not producing a conflict of interest, the governing board or committee shall determine by a majority vote of the disinterested directors whether the transaction or arrangement is in the Organization's best interest, for its own benefit, and whether it is fair and reasonable. In conformity with the above determination it shall make its decision as to whether to enter into the transaction or arrangement.

(d) Violations of the Conflicts of Interest Policy.

(i) If the governing board or committee has reasonable cause to believe a member has failed to disclose actual or possible conflicts of interest, it shall inform the member of the basis for such belief and afford the member an opportunity to explain the alleged failure to disclose.

(ii) If, after hearing the member's response and after making further investigation as warranted by the circumstances, the governing board or committee determines the member has failed to disclose an actual or possible conflict of interest, it shall take appropriate disciplinary and corrective action.

Section 7.4 Records of Proceedings. The minutes of the governing board and all committees with board delegated powers shall contain:

(a) The names of the persons who disclosed or otherwise were found to have a financial interest in connection with an actual or possible conflict of interest, the nature of the financial interest, any action taken to determine whether a conflict of interest was present, and the governing board's or committee's decision as to whether a conflict of interest in fact existed.

(b) The names of the persons who were present for discussions and votes relating to the transaction or arrangement, the content of the discussion, including any alternatives to the proposed transaction or arrangement, and a record of any votes taken in connection with the proceedings.

Section 7.5 Compensation.

(a) A voting member of the governing board who receives compensation, directly or indirectly, from the Corporation for services is precluded from voting on matters pertaining to that member's compensation.

(b) A voting member of any committee whose jurisdiction includes compensation matters and who receives compensation, directly or indirectly, from the Corporation for services is precluded from voting on matters pertaining to that member's compensation.

(c) No voting member of the governing board or any committee whose jurisdiction includes compensation matters and who receives compensation, directly or indirectly, from the Corporation, either individually or collectively, is prohibited from providing information to any committee regarding compensation.

Section 7.6 Annual Statements. Each director, principal officer and member of a committee with governing board delegated powers shall annually sign a statement which affirms such person:

- (a) Has received a copy of the conflicts of interest policy,
- (b) Has read and understands the policy,
- (c) Has agreed to comply with the policy, and

(d) Understands the Corporation is charitable and in order to maintain its federal tax exemption it must engage primarily in activities which accomplish one or more of its tax-exempt purposes.

Section 7.7 Periodic Reviews. To ensure the Corporation operates in a manner consistent with charitable purposes and does not engage in activities that could jeopardize its tax-exempt status, periodic reviews shall be conducted. The periodic reviews shall, at a minimum, include the following subjects:

(a) Whether compensation arrangements and benefits are reasonable, based on competent survey information, and the result of arm's length bargaining.

(b) Whether partnerships, joint ventures, and arrangements with management organizations conform to the Organization's written policies, are properly recorded, reflect reasonable investment or payments for goods and services, further charitable purposes and do not result in inurement, impermissible private benefit or in an excess benefit transaction.

Section 7.8 Use of Outside Experts. When conducting the periodic reviews as provided for in Section 7.7, the Corporation may, but need not, use outside advisors. If outside experts are used, their use shall not relieve the governing board of its responsibility for ensuring periodic reviews are conducted.

The following states have adopted legislation satisfying the requirements of section 508(e) relating to private foundation governing instruments. Information derived from Revenue Ruling 75-38, 1975-1 C.B. 161.

ARTICLE 8 TRANSPARENCY AND ACCOUNTABILITY

Section 8.1 Policy. By making full and accurate information about its mission, activities, finances, and governance publicly available, the Corporation practices and encourages transparency and accountability to the general public.

Section 8.2 Documents Posted For Public Inspection. The Corporation shall post the following documents on its web site:

- (a) Annual Financial Statements.
- (b) Quarterly Performance Data Report to U.S. Treasury for Nevada's Hardest Hit Fund Program.
- (c) IRS Form 990.

ARTICLE 9

Amendments

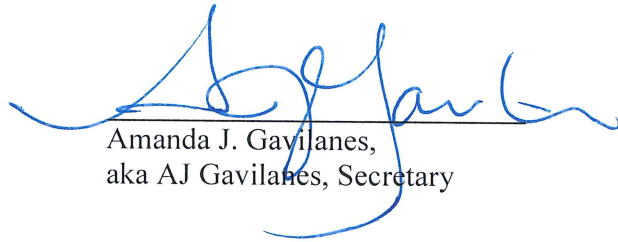
Section 8.3 Power of Board Members. These Bylaws and the Articles of Incorporation for the Corporation may be amended or repealed by the vote of a majority of the Board. Notwithstanding the forgoing, no amendment shall be made to these Bylaws or the Corporation's Articles of Incorporation, which would cause the Corporation to cease to qualify as an exempt Corporation under Section 501(c)(3) of the Internal Revenue Code of 1986 or the corresponding section of any future Federal Tax Code.

CERTIFICATE OF SECRETARY APPEARS ON FOLLOWING PAGE

CERTIFICATE OF SECRETARY

I, the undersigned, certify that I am the presently elected and acting Secretary of the NEVADA AFFORDABLE HOUSING ASSISTANCE CORPORATION, a Nevada nonprofit corporation, and the above Bylaws, consisting of 18 pages (including this page) are the Bylaws of this Corporation as adopted by the unanimous consent of the Members of the Board of Directors on December 20, 2018.

DATED: December 20, 2018


Amanda J. Gavilanes,
aka AJ Gavilanes, Secretary

CODE OF ETHICS, CONFLICTS OF INTEREST, AND BUSINESS CONDUCT GUIDELINES

Introduction

The purpose of these guidelines ("Code") is to assure that employees of NAHAC act in the best interest of NAHAC, without being partial to any particular organization or their own personal interests; devote to NAHAC their undivided loyalty and uncompromised integrity; conform to the highest standards of business ethics; and give the appearance as well as the fact of such impartiality, devotion and integrity. NAHAC expects employees to comply strictly with this Code and to exercise good judgment and reasonable prudence in carrying out NAHAC business. Different employees have different duties with respect to this code. For example,

- managers have a responsibility to foster high ethical standards in the workplace; to responsibilities for the conduct of their staff, and for making sure that their staff are aware of this code and are sensitive to ethical issues;
- employees who make assistance decisions and those employees who procure goods and services for NAHAC, are responsible for ensuring that those decisions reflect good stewardship of NAHAC funds, make effective and efficient use of scarce resources, and ensure that their actions do not give rise to any appearance of favoritism, personal gain or other impropriety.

Violations of this policy will result in discipline, including dismissal. Violations include, but are not limited to, withholding of information concerning unethical conduct and failure by managers to assure that all individuals working for NAHAC are briefed on this policy.

BACKGROUND

NAHAC administers the Hardest Hit Fund programs and provides assistance to homeowners in Nevada in danger of losing their homes. Because NAHAC uses federal funds and is a highly visible organization, the appearance as well as the fact of impartiality is critical. Employment is conditioned upon agreement with this code of conduct and conformance to the highest standards of business ethics in the performance of job duties.

The Code:

1. **Business Ethics.** Each employee shall act at all times with integrity and perform his or her duties in compliance with all applicable federal, state, and local laws and NAHAC policies and procedures.
2. **Impropriety and Appearance Thereof.** Employees will perform their duties in an honest



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and objective manner so their performance will not be challenged or impaired. If there is any doubt about whether circumstances may lead to reasonable questions regarding the impartiality of an employee, the matter must be raised with the Executive Director. NAHAC relies on the integrity of its employees to avoid even an appearance of impropriety.

3. **Obligation to Refrain from Using Relationship for Personal Benefit.** Except by virtue of a good reputation derived from exceptional service to NAHAC, no employee shall seek to use his or her relationship with NAHAC for personal benefit or advancement.
4. **Conflict of Interest.** Employees shall not enter into any relationship, hold any direct or indirect outside interest, or accept outside employment that would conflict with or have the appearance of interfering or conflicting with, their corporate responsibilities and duties, as set forth in the following policies:
 - **Outside Board Service.** Service by any NAHAC Officer (for purposes of this Policy, the term “Officer” shall be limited to corporate officers who are employees of NAHAC) on outside boards shall be subject to advance approval by the Board of Directors. Service by non-officer employees shall be subject to written approval of the Executive Director or equivalent management official. After receiving written approval, employees may participate on the boards of other organizations and participate in such travel, events, and meals involved in such service.
 - **Ownership Interests.** No employee or member of an employee’s household (i.e., living at the same address) may acquire any ownership interest in any entity that has, or is seeking to have, a relationship with NAHAC without the prior approval of the Executive Director or equivalent management official. Employees must make good faith disclosure consistent with this policy.
 - **Business Interests.** Employees are expected to alert the Executive Director or equivalent management official to potential conflicts of interest, not only with respect to matters directly or indirectly related to those business interests that they disclose, but also with respect to any other interest or activity that might call into question their impartiality on a given issue.
 - **Paid Outside Appearances, Outside Employment and Compensation.** While employed with NAHAC, no employee may participate in paid outside appearances or accept outside employment which is or could be perceived as a conflict of interest with NAHAC’s mission. Employees should notify the Executive Director or equivalent management official of any outside employment that may have the potential or appearance of affecting or influencing the employee in the performance of his or her duties.



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Gifts and Business Courtesies

- **Gifts.** NAHAC employees shall not accept gifts from any entity that has, or is actively seeking, a grant, contract, or agreement with NAHAC. Employees shall not accept funds in any amount or tangible items (including tickets to sporting or other events) that have a market value in excess of \$50.00 from any entity that does business or seeks to do business with NAHAC without approval by the Executive Director or equivalent management official. An employee's use of his or her position at NAHAC to solicit gifts is strictly prohibited.
- **Meals and Entertainment.** NAHAC employees may not use their positions to solicit or obtain business courtesies such as meals or entertainment. Employees may accept unsolicited meals, refreshments or entertainment on an occasional basis if such courtesies are valued at less than \$50 and acceptance will promote good business relations without reflecting a pattern or appearance of impropriety from the same entities or persons.
- This policy also prohibits gifts and business courtesies that may be extended to members of an employee's household resulting from the employee's position at NAHAC. Questions regarding gifts and business courtesies should be brought to the Executive Director or equivalent management official. Attempts to influence funding decisions must be promptly reported to the Executive Director or equivalent management official.
- **Conditions on Post-NAHAC Employment.** Employees should be mindful of the appearance of impropriety that might occur at their employment by an entity that has received NAHAC funds, is seeking to receive NAHAC funds, or who has benefited or seeks to benefit from a relationship with NAHAC.
 - Employees shall inform the Executive Director or equivalent management official of any active pursuit of employment with any entity (including its affiliates, employees or agents) which has, or is seeking, a beneficial relationship with NAHAC.
 - Managerial employees who have had substantial involvement in assistance awards or other NAHAC actions to the benefit of an outside consultant, or who exercised supervisory responsibility for such NAHAC actions, shall not be employed by such outside consultant or that consultant's affiliates, employees or agents for a period of one year following his or her employment with NAHAC without approval by the Board of Directors.

STEWARDSHIP

5. **Obligation to Protect and Conserve Corporate Assets.** Each employee has a continuing obligation to protect and conserve NAHAC money, property and other resources, expending them strictly in accordance with policies adopted by the Board of Directors, and pursuant to procedures duly established by NAHAC.
6. **Purchasing Responsibilities.** Employees responsible for NAHAC's purchase or acquisition of goods and services, as well as those involved in making discretionary grants, are responsible for using the purchasing or solicitation method best suited for the acquisition-project in question, whether via competitive bid or sole sourcing. All sole-sourcing decisions must be justified and documented.

GRANTEES AND CONTRACTORS

7. **Grantees and Contractors.** Entities receiving discretionary grants and contracts from NAHAC shall agree to act with integrity and perform their duties in compliance with applicable Federal, state, and local laws; NAHAC contract or grant requirements and otherwise act as efficient and impartial stewards of NAHAC funds. NAHAC managers are responsible for notifying such grantees or contractors of employees' obligation to disclose their pursuit of future employment pursuant to Section 4 hereof, to encourage contractors and grantees to act in accordance with the NAHAC's ethical conduct standards.

OTHER

8. **Campaign Contributions.** No employee may make or be reimbursed for any contributions to political parties or candidates for public office on behalf of NAHAC.
9. **Loss of Public Confidence.** In addition to the examples set forth in this policy, each employee shall avoid any conduct that might result in the loss of public confidence in NAHAC's programs and activities, the impairment of efficiency or economy, or might reasonably give the appearance of: (a) the extension of preferential treatment to any person, group, organization, or other entity; or (b) the compromise or loss of complete impartiality of judgment and action; or (c) the making or implementation of a decision outside NAHAC's policies and procedures.
10. **Prohibition Against Use of Confidential and Nonpublic Information.** No employee shall disclose to others, make personal use of, or permit others to make use of, any information obtained as a result of his or her employment with NAHAC. This prohibition includes information not generally available to the public or is otherwise confidential, whether for direct personal gain or for advice to others with whom he or she has family, business, financial or professional ties.



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11. **Other Restrictions: For Special Circumstances, Duties, or Responsibilities.** The Board may reasonably restrict the conduct or interests of specific employees in light of special circumstances, duties, or responsibilities. Such restrictions will be transmitted to the affected individual in writing.
12. **Notification:** Employee will be notified if it is believed they have breached any of the policies outlined in this document. Disciplinary actions will be based on the severity of the incident; this could include termination of employment.
13. **Sharing Logins and Passwords:** Employees are prohibited from sharing logins and passwords. This conduct will result in discipline up to and including immediate termination even on the first offense.

ANNUAL ORIENTATION AND RE-CERTIFICATION.

14. **Re-certification.** All employees will participate, at least once a year, in an orientation or training session to discuss employee compliance with this Code. Additionally, at least once a year, each employee shall submit a signed copy of the Code to be placed in their personnel file.



CODE OF ETHICS, CONFLICTS OF INTEREST AND BUSINESS CONDUCT GUIDELINES ACKNOWLEDGEMENT

I acknowledge that I have received and reviewed a copy of the Code of Ethics, Conflicts of Interest and Business Conduct Guidelines.

I understand and agree to the terms and conditions set forth in the Code of Ethics, Conflicts of Interest and Business Conduct Guidelines and related NAHAC policies.

Furthermore, I acknowledge that I have been given the opportunity to discuss any information contained in the Code of Ethics, Conflicts of Interest and Business Conduct Guidelines and related NAHAC policies, and any concerns that I may have.

I acknowledge that NAHAC reserves the right to modify or amend its policies and procedures at any time, without prior notice.

These policies do not create any promises or contractual obligations between NAHAC and the Employee, and do not affect the employment-at-will status of the Employee.

Trainee Classification: ☐ Employee ☐ Officer/Director ☐ Contractor/Vendor

Name

Title

Organization (*if other than NAHAC*)

NAHAC Manager or Witness Name

Signature

Signature

Date

Date

Original to be placed in appropriate file for individual (personnel, officer or director, or contractor or vendor file) and a copy to be placed in Mandatory Training Acknowledgments Master file.

FRAUD MITIGATION, DETECTION, AND AWARENESS GUIDELINES

Introduction

The Nevada Affordable Housing Assistance Corporation's (NAHAC) Board of Directors has established an anti-fraud policy to enforce controls and to aid in the prevention and detection of fraud, theft, waste, or abuse against NAHAC and its programs. This policy applies to any fraud, theft, waste, or abuse or suspected fraud, theft, waste, or abuse involving any employee (including management), consultant, vendor, contractor, or outside agency doing business with NAHAC or in any other relationship with NAHAC. This policy is supported and supplemented by a variety of existing policies and procedures including the Employee Handbook, the Code of Ethics; Conflicts of Interest; and Business Conduct policy, and various underwriting, accounting and reporting procedures and guidelines. These policies and procedures further provide a framework to support compliance with these guidelines.

The Board of Directors does not tolerate any type of fraud, waste or abuse. NAHAC's goal is to promote consistent, legal and ethical organizational behavior by:

- Assigning responsibility for reporting fraud, theft or abuse;
- Providing guidelines to conduct investigations of suspected fraudulent behavior; and
- Requiring each employee to attend annual fraud awareness training.

Failure to comply with this policy subjects an employee (including management) to disciplinary action, including immediate termination. Failure to comply by a consultant, vendor, contractor, outside agency, or person doing business with NAHAC or in any other relationship with NAHAC could result in cancellation of the business or other relationship between the entity and NAHAC. The Board of Directors will pursue prosecution if the results of an investigation indicate the possibility of criminal activity.

For purposes of these guidelines only, the term *fraud* or *fraudulent* includes theft, waste, and abuse as defined below. The term *employee* includes employees in management or process positions. The term *management* includes managers, supervisors, key finance personnel, and officers of NAHAC.

Creating a Culture of Honesty and High Ethics

NAHAC has a culture of honesty, integrity and high ethics. Contributing to this are:

- A commitment from the Board of Directors to tolerate only the highest levels of honesty, integrity and ethics.
- A positive workplace environment supported by adequate compensation, benefits and protections.
- Hiring the best-qualified persons and promoting existing employees based on merit.

- Making adequate training opportunities available.
- Issuing discipline in a fair and consistent manner.

Definitions and Examples of Fraud, Waste, and Abuse

Fraud is defined as an intentional deception designed to obtain a benefit or advantage or to cause some benefit that is due to be denied. Fraud can also involve reckless misrepresentations (intent is not required).

Although it may vary by state, the elements of common law fraud are: (1) a material misrepresentation; (2) the misrepresentation was false; (3) when the representation was made, the speaker knew it was false or made it recklessly without any knowledge of the truth; (4) the speaker made the representation with the intent that the other party should act upon it; (5) the party acted in reliance on the misrepresentation; and (6) the party thereby suffered injury. Furthermore, a misrepresentation is fraudulent if the maker: (a) knows or believes that the matter is not as he represents it to be; (b) does not have the confidence in the accuracy of his/her representation that he states or implies; or (c) knows that he does not have the basis for his/her representation that he states or implies.

Examples of fraud include:

- Forgery or alteration of a check, bank draft, or any other financial document;
- Theft of a check or other diversion of a client payment;
- Misappropriation of funds, securities, supplies, or other assets;
- Impropriety in the handling or reporting of money or financial transactions;
- Profiteering as a result of insider knowledge of NAHAC operations; and
- An employee with access to confidential client information who sells this information or uses it in the conduct of an outside business activity.

Fraud may also include a third party pretending to be NAHAC and offers, for an upfront fee, a mortgage modification/principal reduction through an HHF program and no services are delivered.

Waste is the loss or misuse of NAHAC resources that results from deficient practices, system controls, or decisions. An example is purposely not taking advantage of early bird conference registration discounts.

Abuse is the intentional, wrongful, or improper use of resources or misuse of rank, position, or authority that causes the loss or misuse of resources such as tools, vehicles, computers, copy machines, etc. Examples of abuse include, but are not limited to:

- Using NAHAC equipment or supplies to conduct personal business; and
- An employee using non-confidential client information to get new customers for his/her outside business.

Theft is defined as the act of taking something from someone unlawfully. An example of theft is taking home a tool or other piece of equipment belonging to NAHAC and keeping it for personal use.

Responsibility to Report Suspected Fraud

Each employee is required to report, in writing and on NAHAC's prescribed report form; any suspected fraud, theft, waste, or abuse or other dishonest conduct to the designated third-party compliance representatives. Management is required to report suspected fraud, theft, waste, or abuse or other dishonest conduct including reports from employees or other individuals to the NAHAC Board. The NAHAC Board and its Officers have the authority to determine the merits of a report of suspected fraud including obtaining, if necessary, the assistance of the NAHAC Attorney. The identity of an employee or complainant who reports suspected fraud will be protected to the full extent allowed by law.

Suspected improprieties and/or misconduct concerning an employee's ethical conduct should be reported in the same manner and to the same reporting entity as fraud, theft, waste, abuse or other dishonest conduct. Note that there are many instances of prohibited actions that do not rise to the level of fraud, such as an improper relationship with a vendor.

Guidelines for Handling a Report of Suspected Fraud, Theft, Waste, or Abuse

An initial report made by an employee should be made to an Officer or Director of NAHAC, or another individual designated by them. The reporting individual should receive the following instruction and information:

- Do not contact the suspected individual in an effort to determine facts or demand restitution.
- Allow the designated investigative body to conduct the investigation. Do not further investigate the allegations on your own.
- Observe strict confidentiality. Do not discuss the case, facts, suspicions, or allegations with anyone else unless specifically asked to do so by the investigative body, police, or NAHAC's legal counsel.
- Retaliation will not be tolerated. NAHAC will not tolerate any form of retaliation against individuals providing information concerning fraud or suspected fraud.
- Every effort will be made to protect the rights and the reputations of everyone involved including the individual who in good faith alleges perceived misconduct as well as the alleged violator(s).
- The identity of an employee or other individual who reports a suspected act of fraud will be protected as provided by this policy

An initial report made by an external party will be provided to an Officer or Director of NAHAC, or another individual designated by them. Such reports will be investigated, and a determination made as to an appropriate response, if any should be required.

Responsibility of the NAHAC Board

The NAHAC Board of Directors, in consultation with NAHAC Management, legal counsel, and any others designated for such responsibility, shall evaluate the risks of fraud and implement processes, procedures and controls to mitigate those risks. Neither fraudulent financial reporting nor misappropriation of assets can occur without a perceived opportunity to commit and conceal the act. The Board of Directors will be proactive in reducing fraud opportunities by ensuring that the following occur on a regular basis:

- Identification and measurement of fraud risks;
- Steps are taken to mitigate identified risks; and
- Implementation and monitoring of appropriate preventative and detective internal controls and other deterrent measures.

NAHAC's Management and, any other individual(s) designated for such responsibility, shall serve as the primary Fraud and Ethics Advisory Team (Advisory Team) for NAHAC. On receiving a report of fraud, the Advisory Team shall conduct a preliminary investigation to determine the credibility of the report. The Advisory Team may consult and work concurrently with NAHAC's legal counsel during any phase of the investigation. If the report is credible, the Advisory Team and/or NAHAC's legal counsel shall follow the investigation guidelines provided in this policy.

The Advisory Team and/or NAHAC's legal counsel shall make every effort to protect the rights and the reputations of everyone involved in the report of suspected fraud, including the individual who in good faith alleges perceived misconduct as well as the alleged violator(s). The Advisory Team and/or NAHAC's legal counsel shall also make every effort to protect the identity of a person who in good faith reported the suspected fraud; however, disciplinary action may be taken as provided by this policy if a report is made in bad faith.

The Advisory Team and/or NAHAC's legal counsel may find it necessary to involve outside agencies to assist the investigation and may refer questions as to whether the action constitutes fraud to the agency's auditor or outside attorney, as appropriate. The Advisory Team and/or NAHAC's legal counsel shall report suspected fraud to the U.S. Department of the Treasury, Office of Financial Stability and to the Nevada Attorney General's Office, if applicable.

NAHAC shall immediately disclose to the U.S. Department of the Treasury any discovered credible evidence, in connection with the HHF Program, that a management official, employee, or contractor of NAHAC has committed, or may have committed, a violation of Federal criminal law involving fraud, conflict of interest, bribery, or gratuity violations found in Title 18 of the United States Code; or the Civil False Claims Act (31 U.S.C. §§ 3729-3733) or other wrongdoing.

On determining that a report is not credible or is not a report of fraud, the Advisory Team and/or NAHAC's legal counsel shall make a determination as to whether any action should be taken and the extent of such actions. Support for a decision to take any actions should be documented and

maintained by NAHAC. The NAHAC Board of Directors is responsible for the administration, interpretation, and application of these guidelines. The NAHAC Board of Directors is also responsible for guideline adoptions and revisions.

Guidelines for the Investigation of Suspected Fraud

The Advisory Team and/or NAHAC's legal counsel are responsible for the investigation of reported wrongdoing and all suspected fraud and for coordinating investigative activities. Each employee involved in an investigation of suspected fraud shall keep the content of the investigation strictly confidential to the full extent provided by law. Investigation results shall not be disclosed or discussed with anyone other than those who have a legitimate need to know.

Any required investigative activity shall be conducted without regard to the suspected wrongdoer's length of service, position/title, relationship to NAHAC, or any other perceived mitigating circumstance.

The Advisory Team shall maintain appropriate documentation regarding incidents of fraud and restrict access to such information to appropriate personnel until a determination is filed.

If an investigation substantiates fraudulent activities, the Advisory Team and/or NAHAC's legal counsel will communicate the fraudulent activities to the Board of Directors. The NAHAC designated third-party compliance representatives and/or NAHAC attorney shall make such communications as soon as possible after the fraud is confirmed and shall document the content of the investigation, the findings, and any disciplinary action taken as a result of the finding.

The U.S. Department of the Treasury shall be notified by NAHAC's legal counsel, or by the Board of Directors of any suspected fraud and shall be notified of any suspected or discoverable credible evidence of fraud, pursuant to the HPA Participation Agreement.

If an investigation substantiated fraudulent activities of a possible criminal nature, NAHAC's legal counsel shall determine, in consultation with the Board of Directors and/or the Office of the Attorney General, whether to refer the matter to the U.S. Department of the Treasury or law enforcement and/or at what level.

Any inquiries from the suspected individual, his or her attorney/representative, or any other inquirer shall be directed to NAHAC's legal counsel. If necessary, NAHAC's legal counsel will refer these inquiries to the U.S. Department of the Treasury.

NAHAC's Board of Directors is responsible for the investigation of any reported wrongdoing by the Advisory Team and/or NAHAC's legal counsel. The Board of Directors shall follow the same procedures that have been established for the Advisory Team and/or NAHAC's legal counsel to follow when investigating and addressing possible wrongdoing.

Any reported wrongdoing by a member(s) of NAHAC's Board of Directors shall be investigated by the Office of the Attorney General, in accordance with the policies and statutes of the State of Nevada.

Disciplinary Action

Failure to comply with any part of these guidelines will be grounds for disciplinary actions, including immediate termination.

An employee who has engaged in any form of fraud, waste, or abuse; suspects or discovers fraudulent activity and fails to report his or her suspicions as required by these guidelines; or intentionally reports false or misleading information is subject to disciplinary action, including immediate termination.

Any member of management who does not pass on to the NAHAC Board and/or NAHAC Attorney, a report of suspected fraud made by an employee or other person is subject to disciplinary action, including immediate termination.

NAHAC may seek recovery of any losses from fraud, if necessary, through civil action.

Client Fraud within the NAHAC Assistance Programs

NAHAC has developed very specific procedures and guidelines for dealing with fraud by clients of its assistance programs. NAHAC will take one or more of the following actions whenever it reaches a determination that fraud has occurred:

- Enter into a repayment agreement;
- Terminate assistance;
- Seek recovery of any excess subsidies including damages and legal costs through the civil courts; and/or
- Refer the matter to the U.S. Department of the Treasury or Office of the Attorney General.

Fraud Awareness Training

From time to time, training programs regarding fraud awareness become available to NAHAC through various means. As these programs become available, applicable staff may be asked to attend such trainings. At the very least, all employees of NAHAC will be required to attend an Annual Fraud Awareness Training class. After attending any and all Fraud Awareness training classes, the participating employees must sign a form indicating that they have attended the training and understood its content.



FRAUD MITIGATION, DETECTION, AND AWARENESS GUIDELINES ACKNOWLEDGMENT

I acknowledge that I have received and reviewed a copy of the Fraud Mitigation, Detection, and Awareness Guidelines.

I understand and agree to the terms and conditions set forth in the Fraud Mitigation, Detection, and Awareness Guidelines and related NAHAC policies.

Furthermore, I acknowledge that I have been given the opportunity to discuss any information contained in the Fraud Mitigation, Detection, and Awareness Guidelines and related NAHAC policies, and any concerns that I may have.

I acknowledge that NAHAC reserves the right to modify or amend its policies and procedures at any time, without prior notice.

These policies do not create any promises or contractual obligations between NAHAC and the Employee, and do not affect the employment-at-will status of the Employee.

Trainee Classification: ☐ Employee ☐ Officer/Director ☐ Contractor/Vendor

Name

Title

Organization (*if other than NAHAC*)

NAHAC Manager or Witness Name

Signature

Signature

Date

Date

Original to be placed in appropriate file for individual (personnel, officer/director, or contractor/vendor file) and a copy to be placed in Mandatory Training Acknowledgments Master file.



U.S. Department of the Treasury – Hardest Hit Fund (HHF)

Risk and Control Matrix for

Nevada Affordable Housing Assistance Program (NAHAC)

As of 01.22.21

Objective: Provide a minimum framework for the States participating in the HHF Program to meet the HPA Section 4B requirements.

Criteria: HPA Section 4 Oversight; Internal Controls Program, Paragraph B states: “Eligible Entity shall develop, enforce and review on a quarterly basis for effectiveness, an internal control program designed to minimize the risk of fraud, mitigate conflicts of interest, maximize operational efficiency and effectiveness and ensure effective delivery of Services and compliance with this Agreement, EESA and Applicable Laws to the satisfaction of Treasury (the -Internal Control Program"). The Internal Control Program must include documentation of the control objectives for the Services, the associated control techniques, and mechanisms for testing and validating the controls. Eligible Entity shall monitor its contractors, if any, as part of the Internal Control Program. Eligible Entity shall certify and **provide an independent verification of the effectiveness of the Internal Control Program....”**

1 GENERAL			
<i>Control Section</i>	<i>Control Objectives and Activities</i>	<i>Frequency</i>	<i>Staff Name / Role</i>
Control Environment	Objective: The entity demonstrates commitment to integrity and ethical values, and the entity holds individuals accountable for their internal control responsibilities		
	<ul style="list-style-type: none"> The board is made aware of key developments that may affect financial reporting or compliance through regular board meetings 	Monthly	Board of Directors / Management
	<ul style="list-style-type: none"> A code of ethics, conflict of interest, & business conduct exists in policy and in the employee handbook 	Ongoing	Board of Directors
	<ul style="list-style-type: none"> Management, employees, and board members are made familiar with the entity's policies and practices with regard to ethics, accepted operating practices, and positive control environment through signed acknowledgements of the employee handbook for employees or through signed annual conflict of interest agreements for board members 	Annually	Board of Directors / All Employees
	<ul style="list-style-type: none"> Management adopts accounting policies that are appropriate for the entity and consistent with GAAP 	Ongoing	Brian Hardy (CFO) / Verise Campbell (CEO/COO)
	<ul style="list-style-type: none"> Performance reviews are done at least annually for all employees 	Annually	Verise Campbell (CEO/COO)
	Objective: The board of directors demonstrate independence from management in exercising oversight of the development and performance of internal controls		
	<ul style="list-style-type: none"> The general makeup of the governing board is appropriate and adequate given the nature of the entity, including member from the NV Housing Division 	Ongoing	Board of Directors

1 GENERAL (CONTINUED)			
Control Section	Control Objectives and Activities	Frequency	Staff Name / Role
Control Environment (Continued)	<ul style="list-style-type: none"> The board is actively involved in oversight of the organization 	Ongoing	Board of Directors
	<ul style="list-style-type: none"> Monthly financial reports are provided to the board members at board meetings 	Monthly	Ryan Garner (Controller) / Brian Hardy (CFO)
	Objective: With oversight from the board of directors, management establishes structures, reporting lines, and appropriate authorities and responsibilities to achieve financial reporting and compliance objectives		
	<ul style="list-style-type: none"> Management periodically evaluates the entity's organizational structure and makes necessary changes based on changes in its activities, circumstances and/or industry 	Ongoing	Verise Campbell (CEO/COO)
	<ul style="list-style-type: none"> An organizational structure exists with corresponding job descriptions reflecting the responsibilities of respective personnel 	Ongoing	Management
	Objective: The entity demonstrates a commitment to attract, develop, and train competent individuals in alignment with financial reporting and compliance objectives		
	<ul style="list-style-type: none"> There are formal policies and procedures for recruiting, hiring and retention of employees and for employee performance and compensation 	Ongoing	Board of Directors / Management
	<ul style="list-style-type: none"> Employees tend to have the competence and training necessary for their assigned level of responsibility or the nature and complexity of the entity's activities 	Ongoing	Management / Employees

1 GENERAL (CONTINUED)			
<i>Control Section</i>	<i>Control Objectives and Activities</i>	<i>Frequency</i>	<i>Staff Name / Role</i>
Risk Assessment	Objective: The entity specifies objectives with sufficient clarity to enable the identification and assessment of risks related to financial reporting and compliance objectives		
	<ul style="list-style-type: none"> Management adopts accounting policies that are appropriate for the entity and consistent with GAAP 	Ongoing	Management
	<ul style="list-style-type: none"> The entity has established a mission and vision which guide the strategic direction of the organization 	Ongoing	Board of Directors / Management
	<ul style="list-style-type: none"> Management identifies risks related to laws and regulations that may affect financial reporting or compliance through ongoing processes and procedures, quarterly internal compliance reviews, and external audits and compliance review 	Ongoing	Management
	Objective: The entity identifies risks to achieving its objectives and analyzes risks to determine how the risks should be managed		
	<ul style="list-style-type: none"> Management identifies and evaluates risks as a part of the internal control program and quarterly compliance reviews and makes recommendations for changes as needed 	Ongoing	Management
	<ul style="list-style-type: none"> The entity objectives are established in accordance with Treasury guidelines, communicates those objectives as needed, and monitors the adequacy of the design and implementation of the controls meeting those objectives 	Ongoing	Management
	Objective: The entity considers the potential for fraud in assessing risks to the achievement of objectives		

1 GENERAL (CONTINUED)			
<i>Control Section</i>	<i>Control Objectives and Activities</i>	<i>Frequency</i>	<i>Staff Name / Role</i>
<i>Risk Assessment (Continued)</i>	<ul style="list-style-type: none"> Fraud risk assessments are an integral part of the risk identification process (see objectives under Fraud and Conflicts of Interest section below) 	Ongoing	Management
	<ul style="list-style-type: none"> The entity's assessment of fraud risk considers incentives, pressures, attitudes, and rationalizations, as well as the opportunity to commit fraud 	Ongoing	Management
	Objective: The entity identifies and assesses changes that could significantly impact the system of internal control		
	<ul style="list-style-type: none"> Management has established triggers, such as differences from budget, findings from internal compliance reviews, and changes in policies; procedures; and structure for reassessment of risks that may impact financial reporting or compliance objectives 	Ongoing	Management
	<ul style="list-style-type: none"> Management communicates the risk assessment and changes in the entity's environment to all appropriate employees 	Ongoing	Management
	<ul style="list-style-type: none"> The accounting and finance department has sufficient knowledge and experience to identify changes in operating practices that may affect the method or process of recording transactions or maintaining compliance with GAAP and Treasury requirements 	Ongoing	Ryan Garner (Controller) / Brian Hardy (CFO)
<i>Information and Communication</i>	Objective: The entity obtains or generates and uses relevant, quality information to support the functioning of internal control		

1 GENERAL (CONTINUED)			
<i>Control Section</i>	<i>Control Objectives and Activities</i>	<i>Frequency</i>	<i>Staff Name / Role</i>
<i>Information and Communication (Continued)</i>	<ul style="list-style-type: none"> Accounting and compliance procedures are sufficiently formal that management can determine whether the control objective is met and documentation supporting the procedures is in place 	Ongoing	Management
	<ul style="list-style-type: none"> Supporting documentation for transactions are included as attachments in the accounting system at the transaction level 	Transaction level	Accountant
	<u>Objective:</u> The entity internally communicates information, including objectives and responsibilities for internal control, to supporting the functioning of internal control		
	<ul style="list-style-type: none"> Financial and program personnel meet with applicable members of management on a regular basis to discuss operating results through weekly and monthly meetings, phone call, or online communications 	Weekly / Monthly / Ongoing	Management / Operations and Accounting Personnel
	<ul style="list-style-type: none"> Financial reports are provided on a monthly basis to management and the board of directors 	Monthly	Ryan Garner (Controller) / Brian Hardy (CFO)
	<u>Objective:</u> The entity communicates with external parties regarding matters affecting the functioning of internal control		
	<ul style="list-style-type: none"> Management communicates information about the function of internal control over financial reporting and compliance on a timely basis with members of the board at regular board meetings 	Monthly	Management

1 GENERAL (CONTINUED)			
Control Section	Control Objectives and Activities	Frequency	Staff Name / Role
Information and Communication (Continued)	<ul style="list-style-type: none"> There is a process for communication of fraud or non-compliance through the entity's website 	Ongoing	NAHAC Website / Brian Hardy (CFO)
	<ul style="list-style-type: none"> Management maintains regular conversations with officials from Treasury in order to provide them with constant updates and address any findings in accordance with interpretations and guidance on laws and regulations as provided by Treasury 	Weekly / Ongoing	Management / Treasury
Monitoring	Objective: The entity selects, develops, and performs ongoing and/or separate evaluations to determine whether the components of internal control are functioning as designed		
	<ul style="list-style-type: none"> Management's ongoing monitoring provides feedback on the effective design and operation of controls integrated into processes, and on the processes themselves 	Ongoing	Management
	<ul style="list-style-type: none"> Management's ongoing monitoring serves as a primary indicator of both control design and the operating effectiveness of controls, and of risk conditions 	Ongoing	Management
	<ul style="list-style-type: none"> The entity has established an internal control program which provides for quarterly compliance reviews to ensure that control objectives are being met, and for management to provide adequate responses to any observations or findings identified 	Quarterly	Quality Assurance / Management
	Objective: The entity evaluates and communicates internal control deficiencies in a timely manner to those parties responsible for taking corrective action, including senior management and the board of directors, as appropriate		

1 GENERAL (CONTINUED)			
<i>Control Section</i>	<i>Control Objectives and Activities</i>	<i>Frequency</i>	<i>Staff Name / Role</i>
<i>Monitoring (Continued)</i>	<ul style="list-style-type: none"> Reports from external sources (e.g. external auditors, regulators, etc.) are considered for their internal control implications, and corrective actions are identified and taken 	Ongoing	Management
	<ul style="list-style-type: none"> Findings on an internal control deficiency are reported to (1) the appropriate person who is in the position to take corrective actions and, if applicable, (2) at least one level of management above that person, or the board if necessary 	Ongoing	Management
2 ELIGIBILITY			
<i>Risk Assessment</i>	<i>Control Objectives and Activities</i>	<i>Frequency</i>	<i>Staff Name / Role</i>
<p><u>Risk:</u> Incorrect eligibility determination</p> <p><u>Risk:</u> Deed of Trust, Lien Release and/or Note with correct terms not executed/recorded properly or in a timely manner to support the disbursement and recovery of HHF benefits.</p>	<p><u>Objective:</u> Applicant eligibility is properly determined and documented in accordance with program and underwriting requirements (HPA Term Sheet and State underwriting guidelines)</p>		
<p><u>Risk Rating:</u> Medium</p>	<ul style="list-style-type: none"> The HFA/EE has documented underwriting guidelines and policies and procedures that describe in detail the eligibility determination and underwriting requirements over all HHF programs, as amended, that are in accordance with the HPA term sheet for each program 	Ongoing	Veronica Lewis (Operations Manager) / Verise Campbell (CEO/COO)

2 ELIGIBILITY (CONTINUED)			
<i>Risk Assessment</i>	<i>Control Objectives and Activities</i>	<i>Frequency</i>	<i>Staff Name / Role</i>
	<ul style="list-style-type: none"> A preliminary eligibility determination is made during the electronic application process based on information provided by the applicant(s) <ul style="list-style-type: none"> If eligible, the homeowner is provided with an application and a document request list If ineligible, they are notified over the phone and referred to other resources for assistance 	Individual File Basis	Customer Service Representative
	<ul style="list-style-type: none"> Once an initial determination of eligibility has been made, a second level review is completed to verify the recommended underwriting decision and to confirm eligibility 	Individual File Basis	Springboard (Contractor)
	<ul style="list-style-type: none"> A quality control review is performed on a sample of completed files to ensure the appropriate documentation has been maintained in the file and the file was appropriately decisioned. 	Sample File Basis	Quality Control Specialist
	<ul style="list-style-type: none"> An escalation committee has been established to assist in the decision-making process for questionable files and in instances in which the homeowner applicant does not agree with the underwriting decision 	As needed	Verise Campbell (CEO/COO) / Veronica Lewis (Ops Manager) / Tony Cammiso (Call Center Manager)

2 ELIGIBILITY (CONTINUED)			
<i>Risk Assessment</i>	<i>Control Objectives and Activities</i>	<i>Frequency</i>	<i>Staff Name / Role</i>
	<ul style="list-style-type: none"> Participating housing counselors and HFA/EE staff are sufficiently qualified and trained to (1) inquire and obtain the minimum required documentation from potential HHF borrowers to determine eligibility, (2) summarize and document their recommendations based on review and evaluation of the eligibility underwriting process performed <ul style="list-style-type: none"> New users at HCA's are not granted access to the application system until after they have received adequate training 	Ongoing	Cheryl Newkirk (Outreach Coordinator) / Tony Cammiso (Call Center Manager) / Veronica Lewis (Operations Manager)
	<ul style="list-style-type: none"> Checklists are used for eligibility reviews <ul style="list-style-type: none"> The entity utilizes underwriting tools and guidelines, including: <ul style="list-style-type: none"> Policies and procedures Guidelines / Operational term sheets Required Documentation Job Aid Hardship Matrix Approval Validation (006 – QC form) <ul style="list-style-type: none"> This form has various versions based on the program for which eligibility is being determined Denial / Withdrawal (003 – QC form) Income Calculator (005) Closing Checklist 	Ongoing	Veronica Lewis (Operations Manager)

2 ELIGIBILITY (CONTINUED)			
<i>Risk Assessment</i>	<i>Control Objectives and Activities</i>	<i>Frequency</i>	<i>Staff Name / Role</i>
	<ul style="list-style-type: none"> The participating housing counselors and HFA/EE staff understand the specific HHF program eligibility criteria and require identification of and documentation for each of these criteria in the loan underwriting files 	Ongoing	Tony Cammiso (Call Center Manager) / Cheryl Newkirk (Outreach Coordinator)
	<ul style="list-style-type: none"> Routine review of HHF eligibility/underwriting practices are performed and documented in a timely manner, and instances of non-compliance with guidelines and requirements are remediated 	Ongoing	Management / Veronica Lewis (Operations Manager)
	<p><u>Objective:</u> Liens and lien recoveries related to participation in the program are adequately recorded, tracked, and monitored and appropriate communication is made with participants regarding the lien maturity process</p>		
	<ul style="list-style-type: none"> Closing documentation is reviewed directly with participants who are determined eligible to receive assistance 	Individual File Basis	Floater (Temporary Labor) / Veronica Lewis (Operations Manager)
	<ul style="list-style-type: none"> The State of Nevada's "Simplifile" system is used to electronically record deeds of trust in a timely manner 	Individual File Basis	Floater (Temporary Labor) / Veronica Lewis (Operations Manager)

2 ELIGIBILITY (CONTINUED)			
<i>Risk Assessment</i>	<i>Control Objectives and Activities</i>	<i>Frequency</i>	<i>Staff Name / Role</i>
	<ul style="list-style-type: none"> The organization has designated an individual to oversee the tracking and monitoring of lien maturities and recoveries 	Ongoing	Veronica Lewis (Operations Manager)
3 HHF FUNDS, PROPERTY AND OTHER ASSETS			
<i>Risk Assessment</i>	<i>Control Objectives and Activities</i>	<i>Frequency</i>	<i>Staff Name / Role</i>
<p><u>Risk:</u> Misappropriation of HHF funds (both program funds and administrative funds)</p> <p><u>Risk Rating:</u> Low</p>	<p><u>Objective:</u> HHF funds, property and other assets are safeguarded against loss from unauthorized use or disposition</p>		
	<ul style="list-style-type: none"> The entity has documented policies and procedures that describe in detail the requirements over HHF funds, property and other assets 	Ongoing	Board of Directors / Management
	<ul style="list-style-type: none"> Management or board approval of disbursements is required for amounts that exceed established limits according to entity policy 	Transaction level	Timothy Whitright (Board Chair) / Verise Campbell (CEO/COO)
	<ul style="list-style-type: none"> Documentation supporting transactions, including documentation of appropriate authorization, are electronically attached to transactions within the accounting system 	Transaction level	Accountant

3 HHF FUNDS, PROPERTY AND OTHER ASSETS (CONTINUED)			
<i>Risk Assessment</i>	<i>Control Objectives and Activities</i>	<i>Frequency</i>	<i>Staff Name / Role</i>
	<ul style="list-style-type: none"> Purchases are reviewed for compliance with the Uniform Guidance and to ensure compliance with existing policies 	Monthly	Ryan Garner (Controller) / Brian Hardy (CFO)
	<ul style="list-style-type: none"> The general ledger is reviewed by knowledgeable personnel during the month-end close to ensure proper classification 	Monthly	Ryan Garner (Controller) / Brian Hardy (CFO)
	<ul style="list-style-type: none"> The AP aging ledger is reviewed monthly as a part of the month-end close, and any old outstanding items are addressed to ensure errors are corrected timely 	Monthly	Ryan Garner (Controller) / Brian Hardy (CFO)
	<ul style="list-style-type: none"> All supporting documentation is reviewed by designated parties prior to signing a check or authorizing electronic payment 	Transaction level	Verise Campbell (CEO/COO) / Timothy Whitright (Board Chair)
	<ul style="list-style-type: none"> Online wire transfers and other online payments require user authentication through use of passwords and/or bank tokens 	Transaction Level	Accountant / Verise Campbell (CEO/COO)

3 HHF FUNDS, PROPERTY AND OTHER ASSETS (CONTINUED)			
<i>Risk Assessment</i>	<i>Control Objectives and Activities</i>	<i>Frequency</i>	<i>Staff Name / Role</i>
	<ul style="list-style-type: none"> Bank reconciliations are prepared and reviewed in a timely fashion 	Monthly	Ryan Garner (Controller) / Brian Hardy (CFO)
	<ul style="list-style-type: none"> Accounts receivable aging is reviewed on a monthly basis and old outstanding items are investigated as applicable 	Monthly	Ryan Garner (Controller) / Brian Hardy (CFO)
	<ul style="list-style-type: none"> Accounts receivable are compared on a month-to-month basis to ensure reasonableness 	Monthly	Ryan Garner (Controller) / Brian Hardy (CFO)
	<ul style="list-style-type: none"> Assumptions (amortization period) and methods used in amortization calculations are reviewed regularly to ensure they are reasonable and in line with GAAP and applicable regulations or agreements 	Annually / Initial Transaction Date	Ryan Garner (Controller) / Brian Hardy (CFO)
	<ul style="list-style-type: none"> The accounting department reviews the general ledger at least monthly to search for prepaid assets or other transactions that should be reclassified to assets such as deposits etc. 	Monthly	Ryan Garner (Controller) / Brian Hardy (CFO)
	<ul style="list-style-type: none"> The entity has a capitalization and useful lives policy, and the policy has been formally reviewed and approved by management and communicated to departments that request property and equipment purchases 	Ongoing	Board of Directors / Management

3 HHF FUNDS, PROPERTY AND OTHER ASSETS (CONTINUED)			
<i>Risk Assessment</i>	<i>Control Objectives and Activities</i>	<i>Frequency</i>	<i>Staff Name / Role</i>
	Objective: HHF funds are maintained in Treasury approved bank account (Bank of New York Mellon)		
	<ul style="list-style-type: none"> The entity maintains acceptable bank accounts for HHF funds and reconciles the bank accounts on a monthly basis 	Monthly	Ryan Garner (Controller)
	Objective: Capital draw requests for HHF funds are calculated as requested, and documented in accordance with the HPA and program guidelines		
	<ul style="list-style-type: none"> Routine review of HHF funds, property and other assets are performed and documented in a timely manner, and instances of non-compliance with guidelines and requirements are remediated 	Monthly / Quarterly	Brian Hardy (CFO) / Verise Campbell (CEO/COO)
	Objective: HHF funds are properly segregated from non-HHF funds by the HFA/EE		
	<ul style="list-style-type: none"> For HHF program and administrative funds, property and other assets, duties over custody of cash, disbursement approval, recording, reconciling, and report review are adequately segregated 	Ongoing	Varies by transaction type
	<ul style="list-style-type: none"> Payments received in the mail are opened and logged, and a copy is provided to Accountant I and Operations Manager along with all checks/money orders (no cash is accepted) 	Transaction Level	AJ Gavilanes (Office Administrator)
	<ul style="list-style-type: none"> Accountant verifies the amount received equals the amount recorded on the log, and makes the deposit remotely on a separate computer 	Transaction Level	Accountant

3 HHF FUNDS, PROPERTY AND OTHER ASSETS (CONTINUED)			
<i>Risk Assessment</i>	<i>Control Objectives and Activities</i>	<i>Frequency</i>	<i>Staff Name / Role</i>
	<ul style="list-style-type: none"> The CEO/COO verifies that the deposit summary in the accounting system, the image of the remote deposit from the bank and the receipt log all match and signs as evidence of such verification 	Transaction Level	Verise Campbell (CEO/COO)
4 REPORTING			
<i>Risk Assessment</i>	<i>Control Objectives and Activities</i>	<i>Frequency</i>	<i>Staff Name / Role</i>
<p><u>Risk:</u> Inaccurate, unsupported or untimely reporting to Treasury; and potential non-compliance with laws or regulations</p> <p><u>Risk Rating:</u> Low</p>	<p><u>Objective:</u> HHF Quarterly Performance Reports (QPR) and Quarterly Financial Reports (QFR), annual independent audit and agreed-upon procedures reports, and required certifications are submitted timely to Treasury and online (as required), and amounts reported (financial and non-financial) are complete and accurate and reconciled to appropriate supporting documentation</p>		
	<ul style="list-style-type: none"> The entity maintains an annual reporting calendar which provides for sign-offs from the responsible personnel and providing for the timely completion of all reporting requirements. Copies of significant supporting information related to signed-off procedures is saved within the calendar 	Monthly	Ryan Garner (Controller) / Brian Hardy (CFO)
	<ul style="list-style-type: none"> Personnel involved in reporting are trained as to the reporting related compliance requirements 	Ongoing	Brian Hardy (CFO)
	<p><u>Objective:</u> To ensure accounting and program activity is recorded and maintained in accordance with GAAP and Treasury compliance requirements, and provide for adequate supporting documentation for all such activity</p>		

4 REPORTING (CONTINUED)			
<i>Risk Assessment</i>	<i>Control Objectives and Activities</i>	<i>Frequency</i>	<i>Staff Name / Role</i>
	<ul style="list-style-type: none"> Management establishes a well-defined process for financial reporting, including a documented monthly checklist completed as a part of the financial close 	Ongoing	Management / Brian Hardy (CFO)
	<ul style="list-style-type: none"> The HFA/EE has documented policies and procedures that describe in detail the requirements over HHF reporting functions (both internal reporting and reporting to Treasury) 	Ongoing	Board of Directors / Management
	<ul style="list-style-type: none"> The HFA/EE monitors compliance with laws and regulations as a part of their internal control program 	Ongoing	Board of Directors / Management
	<ul style="list-style-type: none"> The HFA/EE has developed and implemented an Internal Control Program (ICP) and Internal Antifraud and Compliance Monitoring Program (IACMP), and the ICP/IACMP and any revisions thereto have been submitted to Treasury 	Quarterly	Quality Assurance
	<ul style="list-style-type: none"> The HHF program's financial statements are independently audited annually, and the HFA/EE submits a copy of the audit results to Treasury in accordance with the HPA 	Annually	Brian Hardy (CFO) / Houldsworth & Russo, CPAs
	<ul style="list-style-type: none"> The HFA/EE utilizes a compliance calendar to ensure that a complete bring-down certificate is submitted to Treasury as required by the HPA agreement 	Semi-annual	Brian Hardy (CFO) / AJ Gavilanes (Office Admin)

5 PROGRAM EXPENSES			
<i>Risk Assessment</i>	<i>Control Objectives and Activities</i>	<i>Frequency</i>	<i>Staff Name / Role</i>
<p><u>Risk:</u> Improper use of HHF funds</p> <p><u>Risk Rating:</u> Medium</p>	<p><u>Objective:</u> The HFA/EE only makes payments to approved servicers for eligible borrowers in the approved amounts for the HHF program(s) and payments made to HHF servicers are adequately supported and made in compliance with program terms and servicer agreements by the HFA/EE</p>		
	<ul style="list-style-type: none"> The HFA/EE has documented policies and procedures that describe in detail the requirements over HHF program expenses 	Ongoing	Board of Directors / Management
	<ul style="list-style-type: none"> The disbursement policy includes the use of a checklist and an appropriate level of review requiring supervisory sign-offs to ensure supporting documentation is verified by another party 	Transaction Basis	Accountant / Verise Campbell (CEO/COO)
	<ul style="list-style-type: none"> Routine review of program payments are performed and documented in a timely manner through the month end close process and the quarterly internal compliance reviews, and instances of non-compliance with guidelines and requirements are remediated 	Monthly / Quarterly	Ryan Garner (Controller) / Brian Hardy (CFO) / Quality Assurance
	<p><u>Objective:</u> The HFA/EE ensures that the HHF servicers apply monthly loan payments to the correct borrower loan account in a timely manner</p>		
	<ul style="list-style-type: none"> For all payments made to servicers, the servicers respond with a payment record (P-record) which confirms the respective accounts and amounts in which payments were applied 	Transaction Basis	Accountant
	<p><u>Objective:</u> HHF program expenses are calculated and accounted for in accordance with GAAP, the HPA agreement, and the Uniform Guidance, and are for actual costs incurred (not estimated or budgeted amounts). Program expenses are recorded in the time period which the expense was incurred and are given consistent treatment between accounting periods</p>		

5 PROGRAM EXPENSES (CONTINUED)			
<i>Risk Assessment</i>	<i>Control Objectives and Activities</i>	<i>Frequency</i>	<i>Staff Name / Role</i>
	<ul style="list-style-type: none"> Payment information in the HFA/EE's loan processing system is entered appropriately into HFA/EE's financial accounting system 	Transaction Basis	Accountant
	<ul style="list-style-type: none"> Experienced, knowledgeable personnel review transactions for possible discrepancies with GAAP, the HPA agreement, and/or the Uniform Guidance 	Monthly	Ryan Garner (Controller) / Brian Hardy (CFO)
	<ul style="list-style-type: none"> The entity confirms loan information provided by the participant electronically with the applicable participating servicers through an inquiry record (I-record) and receiving back either a verification (V-record) or objection (O-record) 	Individual File Basis	Accountant / Springboard (Contractor)
	Objective: Appropriate documentation exists to support HHF program expenses (servicer batch payment records/requests)		
	<ul style="list-style-type: none"> Appropriate levels of review of the loan payment files and documentation are incorporated into the loan approval and disbursement process 	Individual File Basis	Springboard (Contractor) / Escalation Team (See Eligibility Section Above)
6 ADMINISTRATIVE EXPENSES			
<i>Risk Assessment</i>	<i>Control Objectives and Activities</i>	<i>Frequency</i>	<i>Staff Name / Role</i>
<p>Risk: Improper use of HHF funds</p> <p>Risk Rating: Low</p>	<p>Objective: HHF administrative expenses are in accordance with the approved program budget for administrative expenses (permitted expenses) detailed and approved in Schedule C of the HPA, as amended</p>		

6 ADMINISTRATIVE EXPENSES (CONTINUED)

<i>Risk Assessment</i>	<i>Control Objectives and Activities</i>	<i>Frequency</i>	<i>Staff Name / Role</i>
	<ul style="list-style-type: none"> Monthly reviews of administrative payments are performed and documented in a timely manner as a part of the month end close process 	Monthly	Ryan Garner (Controller) / Brian Hardy (CFO)
	<ul style="list-style-type: none"> Routine review of administrative payments is performed and documented as a part of the internal compliance review in a timely manner, and instances of non-compliance with guidelines and requirements are remediated 	Quarterly	Quality Assurance
	Objective: HHF administrative expenses are calculated and accounted for in accordance with GAAP, the HPA and the Uniform Guidance		
	<ul style="list-style-type: none"> The HFA/EE has documented policies and procedures that describe in detail the requirements over HHF administrative expenses 	Ongoing	Board of Directors / Management
	<ul style="list-style-type: none"> Access to payroll and HR data and transactions is appropriately restricted 	Ongoing	Greg Glover (IT Systems Manager)
	<ul style="list-style-type: none"> Standard programmed algorithms perform significant payroll calculations through ADP, and a SOC 1 report is obtained and reviewed regarding the controls at ADP 	Ongoing / Annual (SOC 1)	Tony Cammiso (Payroll Manager)
	<ul style="list-style-type: none"> There is adequate segregation of duties among those who prepare, approve, and receive reports for payroll 	Bi-weekly	Tony Cammiso (Payroll Manager) / Verise Campbell (CEO/COO)
	<ul style="list-style-type: none"> Payroll registers are reviewed after processing by the accounting department at least monthly and compared to budgeted amounts 	Monthly	Ryan Garner (Controller)

6 ADMINISTRATIVE EXPENSES (CONTINUED)			
<i>Risk Assessment</i>	<i>Control Objectives and Activities</i>	<i>Frequency</i>	<i>Staff Name / Role</i>
	<ul style="list-style-type: none"> Changes to salaries or other payroll costs are approved by management 	As needed	Verise Campbell (CEO/COO)
	<ul style="list-style-type: none"> Check requests are created and attached to corresponding invoices, and are then signed off by the preparer and by a separate individual to ensure adequate documentation prior to obtaining authorization 	Transaction Basis	Accountant / Cheryl Newkirk (Outreach Coordinator)
	<ul style="list-style-type: none"> Check requests and prepared checks are authorized by the appropriate level based on policy 	Transaction Basis	Board of Directors / Management
	<ul style="list-style-type: none"> Work orders or purchase orders are prepared for expenses requiring pre-approval. Approvals and check processing follow the same procedures as check requests above 	Transaction Basis	Verise Campbell (CEO/COO)
	Objective: HHF administrative expenses are for actual costs incurred and are identified as direct or indirect costs to the HHF program, including salaries and benefits		
	<ul style="list-style-type: none"> For all time or expenses incurred for programs outside of the HHF funds, time cards and detailed records are kept ensuring that time and associated costs are properly segregated from HHF funds 	Transaction Basis	Accountant / Brian Hardy (CFO)
	Objective: Appropriate documentation exists to support HHF administrative expenses (vendor invoices, approved work order or purchase orders, canceled checks, and time and attendance records)		
	<ul style="list-style-type: none"> Appropriate documentation supporting transactions are saved to the individual transactions in the accounting system 	Transaction Basis	Accountant

6 ADMINISTRATIVE EXPENSES (CONTINUED)			
<i>Risk Assessment</i>	<i>Control Objectives and Activities</i>	<i>Frequency</i>	<i>Staff Name / Role</i>
	<ul style="list-style-type: none"> The disbursement policy includes the use of a checklist and required supervisory sign-offs to ensure supporting documentation is verified by management 	Transaction Basis	Verise Campbell (CEO/COO) / Timothy Whitright (Board Chair)
	Objective: Administrative expenses are recorded in the time period which the expense was incurred and are given consistent treatment between accounting periods		
	<ul style="list-style-type: none"> Appropriate levels of review of the payment request are incorporated in the disbursement process and entered appropriately into the HFA/EE's financial accounting system 	Transaction Basis	Accountant / Verise Campbell (CEO/COO) / Timothy Whitright (Board Chair)
7 FRAUD AND CONFLICTS OF INTEREST			
<i>Risk Assessment</i>	<i>Control Objectives and Activities</i>	<i>Frequency</i>	<i>Staff Name / Role</i>
Risk: Inadequate controls to prevent and detect instances of fraud and conflicts of interest or undue preference with external vendors or other third party providers Risk Rating: Low	Objective: The HFA/EE performs tests and review of procedures that extends to any and all third party participants to include evaluation of instances of inappropriate or illegal behavior, potential or actual fraudulent activities, or conflicts of interest and ensure they are detected and remediated in a timely manner		

7 FRAUD AND CONFLICTS OF INTEREST (CONTINUED)			
<i>Risk Assessment</i>	<i>Control Objectives and Activities</i>	<i>Frequency</i>	<i>Staff Name / Role</i>
	<ul style="list-style-type: none"> The HFA/EE has documented policies and procedures that describe in detail the requirements over the prevention and detection of fraud and conflicts of interest 	Ongoing	Board of Directors / Management
	<ul style="list-style-type: none"> The documented procedures outline consequences in the event there is evidence of fraud and include a process for reporting issues to Treasury and the SIGTARP Hotline 	As incurred	Brian Hardy (CFO) / Verise Campbell (CEO/COO) / Treasury
	Objective: The HFA/EE ensures that external HHF business partners/vendors and employees (including direct and indirect employees, 1099 contractors and temporary hires) are selected without conflict of interest and without undue preference		
	<ul style="list-style-type: none"> Formal RPQ and RFP processes exist, are in compliance with state and federal requirements, and are used in securing participating housing counselors, credit report companies, title companies, etc. 	Ongoing	Board of Directors / Management
	<ul style="list-style-type: none"> Routine training to HHF employees and contractors is provided regarding the definition of fraud and what to do when fraud is suspected, and such training is documented 	Annual	Brian Hardy (CFO)
	<ul style="list-style-type: none"> A fraud email address is included on the entity's website for anonymous fraud or non-compliance reporting. A fraud hotline is also maintained by SIGTARP and is referenced on the entity's website 	Ongoing	Brian Hardy (CFO)
	Objective: The HFA/EE ensures that HHF employees (including direct and indirect employees, 1099 contractors, and temporary hires) are not involved in HHF loan underwriting or approval decisions for any family member or related party		

7 FRAUD AND CONFLICTS OF INTEREST (CONTINUED)			
<i>Risk Assessment</i>	<i>Control Objectives and Activities</i>	<i>Frequency</i>	<i>Staff Name / Role</i>
	<ul style="list-style-type: none"> Routine training to HHF employees and contractors regarding the definition and prohibition of conflicts of interest 	Ongoing	Management
	<ul style="list-style-type: none"> Documentation is maintained of training related to fraud and conflicts of interest including the date, the materials covered, and the attendees 	Annual	Brian Hardy (CFO) / AJ Gavilanes (Office Admin)
	<ul style="list-style-type: none"> Internal compliance reviews include routine checks for instances of conflicts of interest in the internal compliance reviews performed. The internal compliance team is assigned responsibility for monitoring and testing controls for instances of fraud, including selecting sample loan files to check for program eligibility, reviewing financial reports and bank account statements, reviewing external business partner contracts and payments, etc. 	Quarterly	Quality Assurance
8 IT ENVIRONMENT AND DATA SECURITY			
<i>Risk Assessment</i>	<i>Control Objectives and Activities</i>	<i>Frequency</i>	<i>Staff Name / Role</i>
<p><u>Risk:</u> Access to HHF program data and borrower personally identifying information (PII) is not adequately safeguarded</p> <p><u>Risk Rating:</u> Medium</p>	<p><u>Objective:</u> Policies and procedures exist for the accuracy and completeness of information, including the safeguarding of HHF data and borrower PII, authorization and addition of system users, termination of user rights, information back-up and recovery, and retention and destruction of HHF and borrower data</p>		
	<ul style="list-style-type: none"> The HFA/EE has documented policies and procedures that describe in detail the requirements over the HHF IT environment and data security functions 	Ongoing	Board of Directors / Management

8 IT ENVIRONMENT AND DATA SECURITY (CONTINUED)			
<i>Risk Assessment</i>	<i>Control Objectives and Activities</i>	<i>Frequency</i>	<i>Staff Name / Role</i>
	<ul style="list-style-type: none"> The HFA/EE monitors and reviews data security and the IT environment for HHF related data 	Ongoing	Greg Glover (IT Systems Manager)
	<ul style="list-style-type: none"> The HFA/EE collects and maintains copies of third party service contractors' SSAE 16 reports, reviews the report results and findings, and reviews user control considerations and develops and implements mitigating controls, if necessary 	Annual	Greg Glover (IT Systems Manager) / Brian Hardy (CFO)
	<ul style="list-style-type: none"> A process exists to ensure that systems incidents, problems, and errors are reported, analyzed, and resolved in a timely manner via reporting from 3rd party contractors 	Ongoing	Greg Glover (IT Systems Manager) / Agilitec / Speridian
	<ul style="list-style-type: none"> The HFA/EE performs vulnerability, penetration and disaster recovery testing on loan system application and data storage systems and has documented these processes and testing outcomes 	Ongoing	Greg Glover (IT Systems Manager)
	<ul style="list-style-type: none"> Access to homeowner PII is protected against unauthorized access and is limited to appropriate individuals based on job function, and job functions are properly segregated 	Ongoing	Greg Glover (IT Systems Manager) / Agilitec / Speridian
	<ul style="list-style-type: none"> The HFA/EE limits access to borrower PII to authorized users only 	Ongoing	Greg Glover (IT Systems Manager) / Agilitec / Speridian

8 IT ENVIRONMENT AND DATA SECURITY (CONTINUED)			
<i>Risk Assessment</i>	<i>Control Objectives and Activities</i>	<i>Frequency</i>	<i>Staff Name / Role</i>
	<ul style="list-style-type: none"> • Include routine checks to test the IT security and safeguarding of HHF data and borrower PII in the internal compliance reviews performed 	Quarterly	Quality Assurance
	<ul style="list-style-type: none"> • Parties, both internal and external, which are granted access to homeowner PII are made aware of restrictions on copying and disclosing HHF and borrower information through a routine training program before access is granted and annually thereafter. The training materials and attendees are documented 	Ongoing / Annual	Greg Glover (IT Systems Manager)

Appendix I – Descriptions of Groups included as Roles

- Board of Directors
 - Timothy Whitright, Deputy Administrator – Nevada Housing Division
 - President and Chairman
 - Michael Holliday, Chief Financial Officer – Nevada Housing Division
 - Treasurer
 - Sharath Chandra, Administrator – Nevada Real Estate Division
 - NV Dept. of Business and Industry Director
 - Rande Johnsen, Director – Trustee Corps
 - Vice-President & Vice-Chairperson
 - Jim Hastings, President – Hastings Brokerage, Ltd
 - Independent Director
 - Verise Campbell, CEO/COO – NAHAC
 - Ex Officio Member
- Management
 - Verise Campbell (CEO/COO)
 - Brian Hardy (CFO)
 - Veronica Lewis (Operations Manager)
 - Tony Cammiso (Call Center and Payroll Manager)
 - Greg Glover (IT Systems Manager)
- Accountant (Individual filling role varies due to termination, interim, and subsequent hire)
 - Rosa Ozaeta (Accountant I)
 - Alicia Kuykendall (Accounting Supervisor – Ellsworth & Stout)
 - Laura Johnson (Accountant Clerk)
- Quality Assurance Team (Ellsworth & Stout)
 - Melanie Rollo, CPA
 - Tracy Cermak
 - Ryan Garner (Controller)
 - Note: Only involved in non-accounting sections of quarterly reviews (e.g. eligibility, IT, etc.)
- Quality Control Specialist (Internal)
 - Lamar Wyse (Independent Contractor)

RED FLAGS GUIDELINES

The function of the Red Flags Guidelines is to promote and uphold quality control within the organization as well as substantiate compliance with Nevada's Hardest Hit Fund® term sheets and the expectations of the U.S. Department of the Treasury. The result is a coordinated effort in properly authenticating application documentation which will assist in the mitigation of program fraud and misrepresentation.

Identification & Detection of Red Flags

NAHAC has implemented various measures for detecting fraud. This involves examination procedures and red flag indicators. There are a variety of legitimate transactions that can raise a red flag, and the mere presence of a red flag does not automatically indicate suspicious or illicit activity. Rather, they identify files that potentially contain misrepresentations so that fraud can be prevented.

Potential red flags have been enumerated here to assist in the processing, underwriting and quality control review of loan files. These Red Flags do not necessarily mean that misrepresentations have occurred.

General

- Multiple document information changes (i.e. increase or decrease in income to meet approval guidelines)
- Power of Attorney
- Application and verification documentation contain inconsistent or contradictory information (i.e. addresses are not consistent with loan origination information regarding Applicant's primary residence)
- There appears to be a relationship between the underwriter and the applicant
- Credit report indicates alerts (i.e. mismatched address)
- Applicant has an employer listed as one of our vendors

Assets

- Bank statements contain spelling mistakes (i.e. account vs. account)
- Statements contain squeezed-in letters / corrections / strikeouts / font inconsistencies
- Large decrease in balance over prior 60 days
- A second account holder noted who is not listed as an applicant
- Account is recently opened
- High balance in a depository account
- Regular deposits that applicant cites are from employer which are not consistent with income from employment stated income documentation
- Substantial amounts of funds being transferred into and out of account

Pay stubs

- Handwritten
- Contains spelling mistakes (i.e. personal vs. personnel)
- Contains squeezed-in letters / corrections / strikeouts / font inconsistencies
- Does not show name of employer / employee
- Employer address is a PO Box
- Figures are misaligned
- Inconsistent pay periods
- Year-to-date earnings show marked increase from previous year's earnings
- Year-to-date earnings are not consistent w/ annual salary or hourly rate
- Hourly employee with year-to-date income is reflected in round dollar amounts
- Income that is excessive or extremely low compared to position
- Contain additional deductions for debt payments not disclosed
- Amount of income verified through paystubs does not match deposits listed on bank statements

W-2

- EIN is not in the correct format of xx-xxxxxxx
- Handwritten
- Hourly employee with year-to-date income that is reflected in round dollar amounts
- Figures are misaligned
- Figures are squeezed in
- Font is not the same throughout fillable fields of form

1040

- Applicant did not sign / date copies
- Information is not consistent with NVHHF Hardship Affidavit/3rd Party Authorization / W-2
- Social Security Numbers are missing or inconsistent with other documentation in the file
- Income is not consistent with income reflected on loan application and other loan documentation
- Figures are misaligned
- Figures are squeezed in
- Applicant name, SS#, income and deductions have inconsistent fonts
- Strikeovers / alterations found on document (especially for tax year on form)
- Paid preparer hand-writes tax returns or signs all pages of tax return
- Amounts on schedules are not carried over accurately to the 1040 form

Title (County Recorder Website)

- Property is zoned for a different type of property than SFD, Townhouse, Condo or permanently attached manufactured home
- Property subject to a Notice of Default (this indicates the property is in the process of being foreclosed upon)
- A co- Applicant shows on title but is not listed on application

Closing/Funding

- Mail is returned on a recently closed transaction
- Mailing address changes
- Refused face to face interview and used private notary
- Identification inconsistent
- Payments remitted from out of state
- Return address different from subject property address

Preventing and Responding to Red Flags

The presence of any of the previously mentioned red flags should alert the reviewer to take a more in-depth look at a particular file and re-verify as much information as possible from sources which are independent from the originator. When efforts to re-verify information contained in the file are necessary, the file should be escalated to a supervisor for recommendation. Re-verification efforts may include the following:

- Attempting to verify employer listing through www.yp.com or a similar site.
- Initiating a formal verification of employment (VOE) or verification through www.theworknumber.com
- Filing the 4506T with the IRS
- Running a Core Logic report (if not already done)
 - Verify additional liens on property
 - Do addresses match up
- Running a tri-merge credit report (to substantiate info unable to verify through Experian report)

Conflicts of Interest

For all intended purposes NAHAC will entertain providing assistance to any past or present employee and any of their family members, acquaintances or otherwise related individuals providing the applicant qualifies and remits all required documentation in accordance with guidelines.



Employees and friends, family members and acquaintances of employees are considered in these guidelines. As such, anyone that falls into this category will require special processing as they can be considered for any of NAHAC's programs.

Under no circumstances will any underwriter review or work on a file where they have a vested interest or an affiliation with the applicant.

Employees

Employees must submit their file directly to the operations manager. The file will be fully underwritten by independent underwriting personnel and submitted to operations manager or CEO/Executive Director or equivalent management official for final approval. Notes will be included in the file which reiterate the relationship and special processing of the file.

Employee Affiliates

Friends, family members, and acquaintances of employees must also have their files submitted directly to the operations manager and the nature of the relationship disclosed. In these instances, the file will be assigned to an underwriter which does not share an affiliation with the individual. Once the file has been underwritten and a disposition recommended, the operations manager will conduct a final review to confirm and approve the disposition. Notes will be included in the file which reiterate the relationship and special processing of the file.



RED FLAGS GUIDELINES ACKNOWLEDGMENT

I acknowledge that I have received and reviewed a copy of the Red Flags Guidelines.

I understand and agree to the terms and conditions set forth in the Red Flags Guidelines and related NAHAC policies.

Furthermore, I acknowledge that I have been given the opportunity to discuss any information contained in the Red Flags Guidelines and related NAHAC policies, and any concerns that I may have.

I acknowledge that NAHAC reserves the right to modify or amend its policies and procedures at any time, without prior notice.

These policies do not create any promises or contractual obligations between NAHAC and the Employee, and do not affect the employment-at-will status of the Employee.

Trainee Classification: ☐ Employee ☐ Officer/Director ☐ Contractor/Vendor

Name

Title

Organization (*if other than NAHAC*)

NAHAC Manager or Witness Name

Signature

Signature

Date

Date

Original to be placed in appropriate file for individual (personnel, officer/director, or contractor/vendor file) and a copy to be placed in Mandatory Training Acknowledgments Master file.



NEVADA AFFORDABLE HOUSING ASSISTANCE CORPORATION

Authorization Matrix - Financial

Action	Accountant	Operations Manager	Executive Director/CEO	President/Chairman	Board of Directors
Banking					
ACH/Checks Signing (see Check Limits section) Note: All ACH Require the Same Authorization as Checks			X	X	
Wire Transfer Input	X				
Wire Transfer Release		Alternate	X	Alternate	
Electronic Deposits	X		Alternate		
Online Administration			X	X	
Credit Card Assignment			X	X	
Purchasing, Contracts (PO, WO) (Any 2 signatures required)					
\$0 - \$25,000			X	X	
Greater than \$25K					X (Majority)
Capital Assets - Refer to "Check Limits" below					
Check Limits					
\$0 - \$500,000			X	X	
Greater than \$500K					Majority
<p>Unless specifically stated herein above, more than one "X" means approval needed from all positions prior to any action being taken. All expenses need to be backed by an executed Purchase Order and/or Work Order - Unless otherwise noted. When there is a conflict and/or authorizations effect the person(s) holding the position, then the approval of the CEO/Executive Director along with the Chairperson of the Board will be sufficient and override all other approvals, except where Board approval is required in which case approval of the CEO/Executive Director, Chairperson of the Board and a Majority of the Board is required. When there is a conflict and/or authorizations effect the person holding the position of CEO/Executive Director, the approval of Chairperson of the Board will be sufficient and override all other approvals, except where Board approval is required in which case approval of the Chairperson of the Board and a Majority of the Board is required.</p>					

Authorization Matrix - Payroll and HR

Action	Office Administrator	Operations Manager	Payroll Manager	Controller / CFO	Executive Director/ CEO	President/ Chairman	Board of Directors
Payroll							
Approval/ Review					X		
Submission/Release			X				
Human Resources							
New Position Approval							X (Majority)
Hiring of Existing Position					X	X	
Restructuring (changing scope of work & job titles)							X (Majority)
Org Chart Approval							X (Majority)
Promotion Approval							X (Majority)
Pay Changes (any change)							X (Majority)
Edit/Write Access to Salary and Confidential Personal Information in ADP system		X	X		X		
Read Only Access to Salary and Confidential Personal Information in ADP system	X			X			
Overtime Request Approval					X	X	
Involuntary Termination					X		
Leave Requests					X		
<p>More than one "X" means approval needed from all positions prior to any action being taken. All expenses need to be backed by an executed Purchase Order and/or Work Order.</p> <p>When there is a conflict and/or authorizations effect the person(s) holding the position, then the approval of the CEO/Executive Director along with the Chairperson of the Board will be sufficient and override all other approvals, except where Board approval is required in which case approval of the CEO/Executive Director, Chairperson of the Board and a Majority of the Board is required. When there is a conflict and/or authorizations effect the person holding the position, of CEO/Executive Director, the approval of Chairperson of the Board will be sufficient and override all other approvals, except where Board approval is required in which case approval of the Chairperson of the Board and a Majority of the Board is required.</p>							

Reporting of Work Place Injury Notification & Acknowledgment

The Nevada Affordable Housing Assistance Corporation (“NAHAC”) has implemented the following procedure for employees to use when reporting work related injuries or illnesses to NAHAC.

NAHAC strives to provide a safe and secure working environment for all employees. However, when a work related injury or illness occurs (i.e. injuries and illnesses that arise out of, or are incurred in, the course of job related activities on behalf of NAHAC), NAHAC provides appropriate medical care and treatment to the injured employee through its Workers’ Compensation Insurance program. Coverage is provided for all employees who are injured or become ill while acting within the course and scope of their duties. Coverage begins automatically the first day of employment.

For further information on workers' compensation regulations and benefits, contact the Management.

It is NAHAC’s policy to require all work related injuries and illnesses to be reported as promptly and accurately as possible, and in any event within a reasonable time after the employee realizes that he or she has suffered a work related injury or illness. What constitutes a “reasonable time” can vary depending on the facts and circumstances giving rise to the work related injury or illness. For example, an ankle sprain suffered at work should be reported when it occurs while a slow developing or chronic condition which is suffered during the course of employment should be reported once the employee realizes that the condition is work related.

Employees must report all injuries and work related illnesses, regardless of severity, to their supervisor or Management. (the “Authorized Person”). If the employee’s supervisor is not available, the employee should report the work related injury or illness to the Chief Executive Officer/Chief Operating Officer.

The Authorized Person will provide the employee with a form C-1/Notice of Injury or Occupational Disease (Incident Report) to complete. The employee should then seek medical care if needed and complete a Form C-4/ Employee’s Claim for Compensation/Report of Initial Treatment. The C-4 Form will be provided to the employee by the Authorized Person. To obtain coverage, medical care must be rendered by one of the workers’ compensation insurance carrier’s authorized medical providers. The Authorized Person can provide the employee with a list of the carrier’s authorized medical providers.

The health and safety of the effected employee is of utmost importance, therefore if immediate medical attention is necessary, the first priority is to obtain medical attention. In such circumstances, go to the nearest emergency room. The Authorized Person will process the report to the extent possible and it can be completed once the employee’s medical condition has stabilized to the extent necessary for it to be completed.



Reporting of Work Place Injury Notification & Acknowledgment

NOTIFICATION OF RIGHTS – REPORTING OF WORK-RELATED INJURIES & ILLNESSES:

By executing this notification and acknowledgment below, employee acknowledges that he/she has been informed of NAHAC's procedure for reporting work-related injuries and illnesses and that he/she has been advised of the following:

(A) Employees have the right to report work-related injuries and illnesses; and

(B) Employers are prohibited from discharging or in any manner discriminating against employees for reporting work-related injuries or illnesses.

I am a: ☐ Employee ☐ Officer/Director ☐ Contractor/Vendor

Name

Organization (*if other than NAHAC*)

Signature

Date

Original to be placed in appropriate file for individual (personnel, officer/director, or contractor/vendor file)