

# **Risk Assessment April 2022**

Board approved April 19, 2022

Definition of risk: a future action or event with the potential to significantly impact your objectives.

## **Our risk management policy:**

*Community Action of Southeast Iowa is committed to protecting its human, financial and good will assets and resources through the practice of effective risk management. The agency's board and management are dedicated to safeguarding the safety and dignity of its staff, volunteers, clients and anyone who has contact with the organization.*

To comply with Community Services Block Grant (CBSG) Organizational Standard 4.6 "An agency-wide, comprehensive risk assessment has been completed within the past 2 years and reported to the governing board." The agency's 2022 Risk Assessment was conducted using an online tool developed by the Nonprofit Risk Management Center.

## **2022 Suggested areas to be addressed and comments:**

- I. Risk Management Basics
  - a. Consider forming a risk committee.
    - i. Working on this risk assessment primarily is the Planning Director, Executive Director, and Finance Director. The management team and safety committee are also involved to some degree in agency risk assessment. These function as an informal risk committee at this time.
2. Governance Risk
  - a. Increase the engagement and dialogue of the board regarding financial oversight.
    - i. Finance Director Droege will continue to be present at board meetings and available to explain or answer any questions regarding reporting.
3. Facilities and Building Security
  - a. Up to date evacuation plans for all facilities.
    - i. We have them, however some don't have original dates on them.
  - b. Develop a clear, bomb threat policy for the agency.
    - i. We have one for central office, which could be adapted and included in our all agency Safety Handbook.
  - c. Require ID badges for all visitors.
    - i. All doors to centers are monitored and every effort is made that people are not unaccompanied in our buildings. With our small centers, visitors are identifiable and longer term volunteers are introduced to the staff so all are aware of who is in the building.
4. Human Resources and Employment Practices
  - a. Periodic Review of Employment Policies, review and update employment policies yearly.

- i. This is currently done as needed by Human Resources and the Executive Director. It is suggested they be reviewed yearly by an attorney.
    - b. Develop a Workplace Privacy Policy
      - i. Currently a combination of statements under Personnel Policy 710 Security Inspections and Technology Policies cover that there be no expectation of privacy in communications and workstations.
    - c. Training Supervisors to Conduct Reviews
      - i. Annual reviews are expected of all staff. Currently when a review is due human resources notifies the supervisor in which then all levels review the evaluation and often make training comments.
- 5. Financial Reporting and Internal Controls
  - a. Employee Theft
    - i. It is recommended to strengthen our fraud policy and state that we turn crimes into local authorities. We're looking at adding this to our personnel policies under Personnel Policy 701 Employee Conduct and Work Rules.
  - b. Restrictive Endorsements
    - i. Have the mail opener stamp checks with "for deposit only" and the agency bank account. We have ordered a stamp with "for deposit only" to be used on incoming checks by the person who opens the mail.
  - c. Daily bank deposits are suggested
    - i. Our fiscal policies state they will be done weekly. With the small amount of cash we process and donations being locked, we believe this works for our agency.
  - d. Use a bank lock box
    - i. With the variety of funds we have it works for our fiscal staff to process incoming funds. There is a separation of duties to mitigate risk in this area.
  - e. Make all disbursements by check
    - i. Checks are the standard, however the exceptions are regulated and documented when needed.
- 6. Crisis Management and Business Continuity Planning
  - a. Consider a crisis response team
    - i. As a small agency, our management team operates as those to contact in a crisis. Policies are in place for specific incidences as outlined in our Emergency Planning and Safety Policy Handbook.
  - b. Review or update our business continuity plan
    - i. This is a work in progress as directors update their succession plans and work through contingency planning in their programs. COVID was a good example in that while we don't necessarily have policies on paper we are able to adapt and successfully work through issues to continue providing services.
- 7. Client and Participant Safety
  - a. Side hugging regulations
    - i. Staff are educated regarding sexual behaviors, harassment, and relationships. At this time we feel our policies are sufficient in this area.
- 8. Transportation

- a. Have a driver training program
    - i. This is unrealistic for all drivers at our agency. We do have a policy surrounding driving, check driving history, and run every employee through our insurance company.
  - b. Have a transportation risk management statement
    - i. We have safeguards in place to mitigate these risks, including but not limited to: getting drivers licenses and personal vehicle insurance cards on all new employees, requesting updated insurance cards, sending all driving employees to our insurance carrier for approval or exclusion, Head Start busses have daily check logs, bus drivers must have current certifications, Head Start has clear expectations for those on the busses, etc.
  - c. Have pre and post use vehicle inspections to help document vehicle conditions.
    - i. We have quarterly vehicle inspections turned into the planning director and issues communicated with the program director responsible for the vehicle. As mentioned above, Head Start busses have daily checklists. Daily use Weatherization vehicles do walk-arounds before moving and communicate maintenance needs to the director.
9. Technology and Privacy Risk Management
- a. Develop a data classification policy
    - i. Our Personnel Policy 109 Ethics Policy, section A. Confidentiality of Information, deals with customer information. Our Fiscal Policy under U. Record Retention describes records, the manner of record keeping, and how/when the records may be disposed of.
  - b. Conduct regular phishing tests/exercises
    - i. This is something for us to look into. We have begun better education around good technology practices and still have a ways to go.
  - c. Monitor employee's use of technology
    - i. We have no specific policy of monitoring though we do have policies regarding employee's technology use. Supervisors notice things here and there and speak with employees about concerns.
10. Special Events
- a. Designate a safety officer for special events
    - i. The human resource manager attends training days and would be the one who would document safety concerns or incidents/accidents. Staff know to report these to her in daily work situations. It would be the same for special events. Safety Committee Chair and Planning Director Albrecht is also at most large training events other than Head Start. Head Start staff would report to their supervisor, administrative coordinator or Head Start director.
  - b. Document risk management activities prior to events
    - i. We primarily use repeat vendors for training days, which comprise the majority of our special events. This lends familiarity with location, staff, and risks.
11. Volunteer Risk Management

- a. Develop volunteer position descriptions.
  - i. We are a small enough agency most volunteer positions can be tailored to the volunteer's skills rather than position descriptions.
- b. Conduct reference checks on all volunteers.
  - i. Our insurance review also noted this and we are in the process of updating our volunteer manual.
- c. Have an onboarding/orientation for all volunteers.
  - i. While we now have a standardized process with our volunteer handbook, it is not practical for all volunteers, such as those who volunteer for one hour helping in the food pantry, to go through the same training.
- d. Have an established termination process for volunteers.
  - i. Currently it is up to the supervisor/program director in how to address volunteers who are not working out or violate policies.
  - ii. We are in the process of adding a corrective action/termination form/policy to our Volunteer Handbook.

12. Fundraising and Resource Development

- a. Create a gift acceptance policy
  - i. Personnel Policy 701 Employee Conduct and Work Rules address employees not requesting gifts and CACFP not accepting gifts. This policy could be updated to reflect a better gift policy.

13. Contracts – no actions suggested.

14. Service Delivery Risks – no actions suggested.

**Progress** since 2020 assessment:

- 1. Volunteer Manual developed and utilized.
- 2. Technology policies developed and included in New Employee Orientation materials.
  - a. Phishing scam email information regularly communicated to employees.
  - b. Password policy developed and included in Technology Policies.
  - c. Remote work policy and form developed and implemented.
  - d. Data breach plan developed and included in Technology Policies.

**Progress** since 2018 assessment:

- 1. Quarterly facility inspections
- 2. Quarterly vehicle inspections
- 3. Workplace violence policy
- 4. Clear ethics and sexual conduct training
- 5. Office technology policy regarding emails and computers

14 page Executive Summary or full 78 page 2022 Risk Assessment report available upon request