

## Chapter 80 - Accounting Policies

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### **80.30 State Accounting and Reporting Policies**

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## **80.30**

# **State Accounting and Reporting Policies**

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### **80.30.05 State accounting and reporting principles must conform with Generally Accepted Accounting Principles (GAAP)**

The basic principles governing the accounting and reporting activities of the State are required by statute to be in conformance with generally accepted accounting principles (GAAP).

The significant accounting and reporting policies of the State of Maine are in conformance with generally accepted accounting principles (GAAP) as prescribed by the Governmental Accounting Standards Board (GASB). For government-wide and proprietary fund reporting, the State also applies the following pronouncements issued on or before November 30, 1989, unless those pronouncements conflict with or contradict GASB pronouncements.

1. Financial Accounting Standards Board (FASB) Statements and Interpretations.
2. Accounting Principles Board (APB) Opinions.
3. Accounting Research Bulletins (ARBs) of the Committee on Accounting Procedures.

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### **80.30.10 What is our fund/account structure?**

In accordance with GAAP, the State defines a fund/account as a fiscal and accounting entity with a self-balancing set of accounts used by agencies to record transactions. Fund/account accounting is designed to demonstrate legal compliance and fiscal accountability by segregating transactions related to certain government functions or activities.

For reporting purposes, the State administratively combines accounts with activity and/or balances into roll-up funds. A roll-up fund is a reporting entity. It is comprised of the various accounts which generally fall within the generic activity/nature of the roll-up fund's title.

For reporting purposes, funds can be categorized into one of eleven “roll-up fund types.” These eleven fund types can be grouped into three broad categories: governmental funds, proprietary funds, and fiduciary funds.

Five fund types are used to account for the “governmental type” activities of the State and these are categorized as governmental funds. Two fund types are used to account for the State’s “business type” activities and these are categorized as proprietary funds. The remaining category is for the State’s fiduciary funds which are used to account for resources that are held by the State as a trustee or agent for individuals/organizations outside the State and cannot be used to support the State’s own programs.

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**80.30.15      What are subsidiary accounts?**

The State uses subsidiary accounts for tracking general capital assets and the invested portion of the Treasurer’s Cash Pool. Subsidiary accounts are record keeping mechanisms that provide a basis for accountability and tracking the State’s general capital assets and invested portion of the Treasurer’s Cash Pool.

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**80.30.20      What is our measurement focus and basis of accounting?**

80.30.20.a      The accounting and financial reporting treatment applied to an account is determined by its measurement focus. All governmental fund type accounts are accounted for using a flow of current financial resources measurement focus. With this measurement focus, only current assets and current liabilities generally are included on the Governmental Funds balance sheet. Operating statements for these accounts present inflows (i.e., revenues and other financing sources) and outflows (i.e., expenditures and other financing uses) of expendable financial resources.

All proprietary and trust fund type accounts are accounted for using a flow of economic resources measurement focus. With this measurement focus, all assets and liabilities associated with the operations of these accounts are included on their respective statements of net assets. Operating statements present increases (i.e., revenues) and decreases (i.e., expenses) in total net assets. Net assets in proprietary fund type accounts are segregated into three components: invested in capital assets, net of related debt; restricted; and unrestricted. Net assets for trust fund type accounts are held in trust for external individuals and organizations.

The modified accrual basis of accounting is used by all governmental fund type accounts. Under the modified accrual basis of accounting, revenues are recognized when susceptible to accrual (i.e., when they become both measurable and available). “Measurable” means the amount of the transaction is reasonably estimable. “Available” means collectible within the current period or soon enough thereafter to be used to pay liabilities of the current period. Primary revenues that are determined to be susceptible to accrual include: income taxes, sales and use taxes, and other taxes; federal grants; federal reimbursements; charges for services; and, other reimbursements for use of materials and services.

The State generally considers revenues as available if they are collectible within 60 days of the end of the fiscal year. Individual income, corporate income, and sales and use taxes are considered available if collectible within 12 months of the end of the fiscal year. Revenues from other sources are recognized when received because they are generally not measurable until received in cash. Grants and similar items are recognized as revenues as soon as all eligibility requirements imposed by the provider have been met. Property taxes are recognized as revenue in the year for which they are levied, provided the “available” criterion is met.

Under modified accrual accounting, expenditures are recognized when the related liability is incurred. Exceptions to the general modified accrual expenditure recognition criteria include unmatured interest on general long-term debt which is recognized when due, and certain compensated absences and claims and judgments which are recognized when the obligations are expected to be liquidated with expendable available financial resources.

All proprietary and trust fund type accounts are accounted for using the accrual basis of accounting. Under the accrual basis of accounting, revenues are recognized when they are earned and expenses are recognized when incurred.

The State defers recognition of revenue under certain conditions. Deferred revenues arise when a potential revenue does not meet both the “measurable” and the “available” criteria for revenue recognition in the current period. Deferred revenues also arise when resources are received by the State before it has a legal claim to them, such as when grant monies are received prior to incurring qualifying expenditures/expenses.

80.30.20.b For government-wide reporting purposes, the State uses the economic resources measurement focus and the accrual basis of accounting. Revenues are recorded when earned and expenses are recorded when a liability is incurred, regardless of the timing of the related cash flows. Property taxes are recognized as revenue in the year for which they are levied. Grants and similar items are recognized as revenue as soon as all eligibility requirements imposed by the provider have been met.

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**80.30.25 General budgetary policies**

Governmental fund type accounts are budgeted primarily on a cash basis. Sales, income, corporate and fuel taxes include a modified accrual basis adjustment to recognize revenues that are expected to be collected within 60 days of the end of the fiscal year. Certain governmental activities are excluded from budgetary reporting because they are not appropriated. These activities include: Tax Increment Financing; Circuit-Breaker Program; federal surplus food commodities; and, food stamp benefits.

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**80.30.27 General reporting policies**

80.30.27.a In accordance with GAAP, the State annually prepares and publishes a Comprehensive Annual Financial Report (CAFR), which presents the primary government and its component units, entities for which the State is considered to be financially accountable.

80.30.27.b A State agency or component unit may prepare and publish separate, stand-alone financial reports as deemed necessary. When these reports are prepared in accordance with GAAP, the relationship between the agency or component and the State should be disclosed on the cover of the report as well as in the notes to the financial statements. Refer also to Subsection 90.10.60.

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**80.30.28 What is the State of Maine reporting entity?**

In defining the State of Maine for financial reporting purposes, management considers: all organizations, institutions, agencies, departments, and offices that are legally part of the State (the primary government); organizations for which the State is financially accountable; and other organizations for which the nature and significance of their relationship with the State are such that exclusion would cause the State's financial statements to be incomplete.

The primary government of the State includes its agencies, and blended component units. Blended component units, although separate entities, are part of the State's operations in substance. Accordingly, they are reported as part of the State and blended into the appropriate funds.

The State reports discretely presented component units in a separate column in the government-wide financial statements. Discretely presented component units are legally separate from the State and primarily serve or benefit those outside of the State. They are financially accountable to the State, or have relationships with the State such that exclusion would cause the reporting entity's financial statements to be misleading or incomplete.

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### **80.30.30 Pooled cash and investment policies**

Investments of surplus or pooled cash balances are reported by the State as "Equity in Treasurer's Cash Pool." The Office of the State Treasurer invests State treasury cash surpluses where funds can be disbursed at any time without prior notice or penalty.

The policy for valuing investments varies depending upon the nature of the investment. Short-term money market investments and participating interest-earning investment contracts that have a remaining maturity at time of purchase of one year or less are reported at amortized cost. Participating contracts are investments whose value is affected by market (interest rate) changes. If these contracts are negotiable or transferable, or their redemption value considers market rates, they should be considered participating. Nonparticipating contracts, such as nonnegotiable certificates of deposit with redemption terms that do not consider market rates, are reported using a cost-based measure. Investments in open-end mutual funds are reported at fair value, which is determined by the fund's current share price. All other investments are reported at fair value. Fair value is determined using quoted market prices for marketable securities and other reasonable methods for investments where market values are not readily available.

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**80.30.35 Receivables policy**

Receivables in the State's governmental fund type accounts consist primarily of tax and federal revenues. Receivables in all other accounts arise in the ordinary course of business. When either the asset or revenue recognition criteria has been met, the receivables are recorded.

For government-wide reporting purposes, amounts reported in the funds as interfund/interagency receivables and payables are eliminated in the governmental and business-type activities columns of the Statement of Net Assets, except for the net residual balances due between the governmental and business-type activities, which are presented as internal balances. Amounts reported in the funds as due to or from fiduciary funds are reported in the Statement of Net Activities as other receivables and accounts payable.

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**80.30.40 Inventories policy**

Consumable inventories, consisting of expendable materials and supplies held for consumption, are valued and reported for financial statement purposes if the fiscal year-end balance on hand is considered significant. The costs of materials and supplies of the governmental funds are reported as expenditures when purchased. Consumable inventories are generally valued at cost using the first-in, first-out method. Donated consumable inventories are recorded at fair market value. Unexpended balances of food stamps, and undistributed vaccines and food commodities are reported at face value.

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**80.30.45 Capital assets policy**

**Capitalization** - Except as noted below, it is the State's policy to capitalize:

- All land;
- The State highway system operated by the Department of Transportation;
- Infrastructure, other than the State highway system, with a cost of \$3,000 or more; and
- All other capital assets with a unit cost of \$3,000 or more.

Capital assets acquired by capital leases with a net present value or fair market value, whichever is less, of \$100,000 or more are also capitalized.

Purchased capital assets are valued at cost where historical records are available and at estimated historical cost where no historical records exist. Capital asset costs include the purchase price plus those costs necessary to place the asset in its intended location and condition for use. Normal maintenance and repair costs that do not materially add to the value or extend the life of the State's capital assets are not capitalized.

Donated capital assets are valued at their estimated fair market value on the date of donation, plus all appropriate ancillary costs. When the fair market value is not practically determinable due to lack of sufficient records, estimated cost is used. Where necessary, estimates of original cost and fair market value are derived by factoring price levels from the current period to the time of acquisition.

Art collections, library reserve collections, and museum and historical collections that are considered inexhaustible in that their value does not diminish over time, are not capitalized by the State if all of the following conditions are met:

- The collection is held for public exhibition, education, or research in furtherance of public service, rather than financial gain.
- The collection is protected, kept unencumbered, cared for, and preserved.
- The collection is subject to policy requirements that the proceeds from sales of collection items be used to acquire other items for the collection.

The value of assets constructed by agencies for their own use includes all direct construction costs and indirect costs that are related to the construction. In proprietary and trust fund type accounts, net interest costs (if material) incurred during the period of construction are capitalized.

The OSC reserves the right to establish different capitalization thresholds for financial reporting purposes than those used to account for capital assets within the fixed assets subsystem.

**Depreciation** - With the exception of the State highway system, land, inexhaustible collections, and construction in progress, depreciation is calculated on general capital assets. However, depreciation expense of general capital assets is not recorded in governmental fund type accounts. Depreciation is recorded in the General Capital Assets Subsidiary Account for reporting on the government-wide financial statements.

Depreciation is calculated using the straight-line method over the estimated useful lives of the assets. Generally, estimated useful lives are as follows:

Buildings & building components	30 - 50 years
Furnishings, machinery & equipment	2 – 7 years
Improvements to land and buildings	10 – 15 years

**Modified Approach to Depreciation** - The State capitalizes the State highway system as a network but does not depreciate it since the system is being preserved approximately at or above a condition level established by the State. That condition level is documented and disclosed. Additionally, the highway system is managed using an asset management system that includes:

- Maintenance of an up-to-date inventory of system assets;
- Performance of condition assessments of the assets at least every three years with summarization of the results using a measurement scale; and,
- Annual estimation of the amount to maintain and preserve the assets at the condition level established and disclosed.

All State highway system expenditures that preserve the useful life of the system are expensed in the period incurred. Additions and improvement that increase the capacity or efficiency of the system are capitalized. This approach of reporting condition instead of depreciating the highway system is called the Modified Approach.

**Reporting** - For government-wide financial reporting purposes, capital assets of the State are reported as assets in the applicable governmental or business type activities column on the Statement of Net Assets. Depreciation expense related to capital assets is also reported in the statement of activities. Capital assets and the related depreciation expense are also reported in the proprietary fund type financial statements.

In governmental fund type accounts, capital assets are not capitalized in the accounts that acquire or construct them. Instead, capital acquisitions and construction are reflected as expenditures in the year acquired and recorded in the General Capital Assets Subsidiary Account. The General Capital Assets Subsidiary Account is a record keeping mechanism that provides a basis for accountability and control over the State's capital assets other than those accounted for in proprietary or fiduciary funds.

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**80.30.50 Short-term liabilities policy**

Short-term liabilities are legal obligations of the State that arise upon the receipt of goods or services. In governmental fund type accounts, they are payable from current financial resources. In proprietary and fiduciary fund type accounts, they represent items payable within one year.

In proprietary and fiduciary fund types, as well as the General and Highway Bond Funds, short-term liabilities also include the short-term portion of long-term obligations. The short-term portion of long-term obligations is the amount due within one year.

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**80.30.55 Compensated absences policy**

- **Vacation, Compensatory and Personal Leave** - State employees earn vacation, compensatory and personal leave that, if not used for paid time off, results in full compensation at termination or retirement. It is generally the State's policy to liquidate unpaid vacation, compensatory and personal leave with future resources rather than currently available expendable resources. Accordingly, governmental fund type accounts recognize vacation, compensatory and personal leave when it is paid. A liability for accumulated vacation, compensatory and personal leave, including related payroll benefits and taxes, is recorded for governmental fund type accounts on the Government-wide financial statements only. Proprietary and trust fund type accounts recognize the expense and record a liability for vacation, compensatory and personal leave, including related payroll taxes and benefits, as it is earned.
- **Sick Leave** - The State's policy with respect to sick leave is that if it is not used for paid time off, up to 90 days of unused sick leave may be credited towards State service for retirement purposes. The State is not liable to compensate employees through cash payments for unused, accumulated sick leave when they retire or die. For financial reporting purposes, the State has no liability for unused sick leave at June 30. Accordingly, the State recognize sick leave when it is paid.

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**80.30.60****Long-term obligations policy**

Long-term obligations expected to be financed from proprietary and fiduciary fund type accounts are accounted for in those accounts. Long-term obligations expected to be financed from resources received in the future by governmental fund type accounts are accounted for in the General and Highway Bond Funds.

The General and Highway Bond Funds are a record-keeping mechanism that provides a basis for accountability and control over the State's long-term obligations other than those accounted for in proprietary and fiduciary funds.

For governmental fund type financial reporting, the face (par) amount of the debt issued is reported as other financing sources. Original issuance premiums and discounts on debt issuance are also reported as other financing sources and uses respectively. Issue costs are reported as debt service expenditures.

For government-wide financial and proprietary fund reporting purposes, long-term obligations of the State are reported as liabilities in the applicable governmental or business type activities column on the Statement of Net Assets. Bonds payable are reported net of applicable original issuance premium or discount. When material, bond premiums, discounts, and issue costs are deferred and amortized over the life of the bonds.

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**80.30.65****Fund equity policy**

Fund equity represents the difference between assets and liabilities. In governmental fund type accounts, fund equity is called "fund balance." Reserved fund balance represents the portion of fund balance that is: (1) not available for appropriation or expenditure, and/or (2) that is legally segregated for a specific future use. Unreserved, designated fund balance indicates tentative plans for future use of financial resources. Unreserved, undesignated fund balance represents the amount available for appropriation.

In proprietary fund type accounts, fund equity is called net assets. Net assets is comprised of three components – invested in capital assets, net of related debt; restricted; and unrestricted.

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## **80.30.67 Revenues and expenses policy**

### **80.30.67.a Revenues**

For the government-wide Statement of Activities, revenues are classified as either “program” revenues or “general” revenues.

- **Program revenues**

Program revenues offset the expenses of major programs. Program revenues are identified using the following criteria:

- Charges to customers for goods and services of the program. A customer is one who directly benefits from the goods or services or is otherwise directly affected by the program, such as a State citizen or taxpayer, or other governments or nongovernmental entities.
- Amounts received from outside entities that are restricted to one or more specific program. These amounts can be operating or capital in nature.
- Earnings on investments that are restricted to a specific program are also considered program revenues.

- **General revenues**

Revenues not included in program revenues are considered general revenues. They are not matched to specific program expenses. These revenues are from State taxpayers and from State-generated activities.

General revenues include the following:

- Taxes, even those levied for a specific purpose;
- Interest earnings not specifically restricted to a specific program; and,
- Grants and contributions not specifically restricted to a program.

- **Other**

Contributions to term and permanent endowments, contributions to permanent fund principal, special and extraordinary items, and transfers are reported separately from, but in a manner consistent with, general revenues.

When both restricted and unrestricted resources are available for use, it is the State's policy to use restricted resources first and then use unrestricted resources as they are needed.

80.30.67.b

### **Expenses**

For government-wide reporting purposes, amounts reported as activity expenses include those expenses directly related to a major program. Depreciation on capital assets specifically identified with a given program is considered a direct expense. All other depreciation is reported as part of the “general government” program. Interest expense is not considered a direct expense except in those cases where its exclusion as a direct cost of a program would be misleading. In order to avoid “doubling up” of expenses, internal service fund activity is generally eliminated.

80.30.67.c

### **Operating/Nonoperating**

The State’s proprietary funds make a distinction between operating and nonoperating revenues and expenses. Operating revenues and expenses generally result from providing goods and services directly related to the principal operations of the funds. For example, operating revenues for the State’s workers’ compensation and health insurance funds consist of premiums collected and investment earnings. Operating expenses consist of claims paid to covered individuals, claims adjustment expenses, costs of commercial insurance coverage, and administrative expenses. All revenues and expenses not meeting this definition are reported as nonoperating, including interest expense and investment gains and losses.

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## **80.30.70**

### **Insurance activities policy**

In instances where the State has retained the risk of loss related to insurance type activities, claims and judgment liabilities are reported when it becomes probable that a loss has occurred and the amount of the loss can be reasonably estimated. Liabilities include an actuarially determined amount for claims that have been incurred but not reported. Because actual claims liabilities depend on such complex factors as inflation, changes in legal doctrine, claims adjudication, and judgments, the process used in estimating claims liabilities does not necessarily result in an exact calculation. Claims liabilities are re-evaluated periodically to take into consideration recent settlements, claim frequency, and other economic, legal or social factors. Adjustments to claims liabilities are charged or credited to an expense in the period in which the adjustment is made.

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**80.30.75 Interfund activities policy**

The State engages in two major categories of interfund/interagency activity: reciprocal and nonreciprocal.

Reciprocal interfund/interagency activity is the internal counterpart to exchange and exchange-like transactions and includes both interfund loans and services provided and used. Nonreciprocal activity is nonexchange in nature and includes both transfers and reimbursements.

As a general rule, the effect of interfund/interagency activities is eliminated for government-wide financial statement reporting purposes. Exceptions to this rule are charges between the State's employee health insurance and workers' compensation insurance programs and various other functions of the State. Elimination of these charges would distort the direct costs and program revenues reported for the various activities concerned.

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**80.30.80 How to establish accounts**

Accounts required by law to be maintained within the State's accounting system are established by legislative action. These accounts are subject to appropriation unless specifically exempted. All receipts shall be deposited into the accounts. Monies in the accounts may be spent only after appropriation.

Accounts that are not subject to appropriation are generally authorized in statute and created by the OSC.

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**80.30.82 The State has adopted a Uniform Chart of Accounts**

OSC has adopted a standard system of classifying agency financial information to fulfill the need for uniform, consistent terminology and classifications to be used for budgeting, accounting and reporting the financial activities of the State. Financial transactions are described by means of alphanumeric indicators which are assigned to descriptive titles. Chapter 75 of this manual presents the State's uniform chart of accounts.

For management purposes, agencies may maintain a more detailed level of accounting data. Optional agency designated codes include reporting organizations, sub-object codes, and report categories, among others. Refer to Section 75.10.

Account Type – The two digit numeric code assigned by MFASIS (Advantage) to identify the type of account, within the general ledger, affected by the transaction being processed.

Fund Code - The four character numeric code [we currently use only three characters] assigned by OSC to identify each specific accounting entity against which transactions are recorded.

Agency Code - The three character alphanumeric code assigned to designate distinct operational units of State government.

General Ledger/Balance Sheet Account Code - The four character numeric code assigned by OSC to identify the titles which classify, in summary form, all financial transactions of the State.

Reporting Organization - The four character alphanumeric code assigned to identify each major activity or function within a single fund. Organization codes beginning with zero [Appropriation Organizations] are established by the legislature and represent the levels at which appropriations are controlled. All other organization codes [Reporting Organizations (Unit)] are established by OSC, at the request of user agencies, to facilitate reporting and analysis.

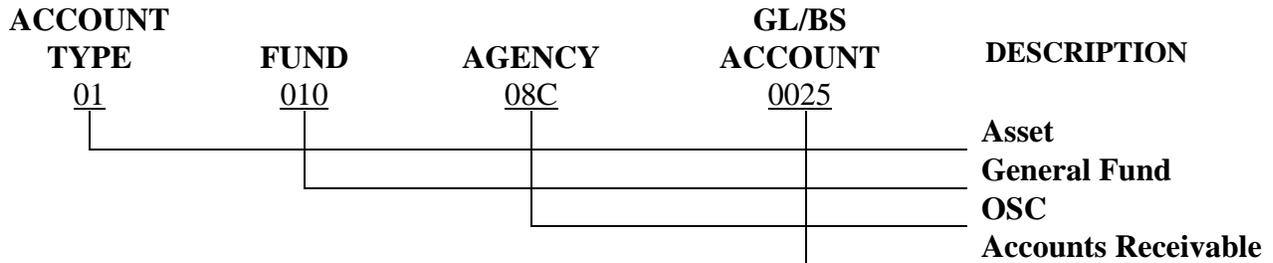
Appropriation Unit - The three character numeric code used to identify the distinct legislative or executive appropriation given to a specific program and its line category.

Revenue Source Code - The four character numeric code assigned by OSC to identify the origin, or originating categories, from which revenues/receipts are derived.

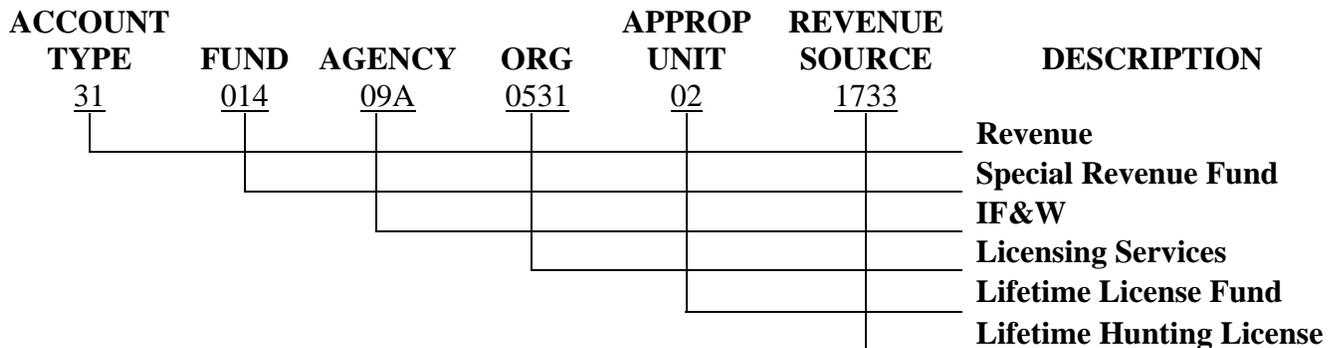
Object Code - The four character numeric code assigned by OSC to identify expenditures/expenses according to the character of the goods or services purchased.

The following diagrams illustrate the uniform statewide account code structure format for general ledger, revenue and expenditure/expense accounting:

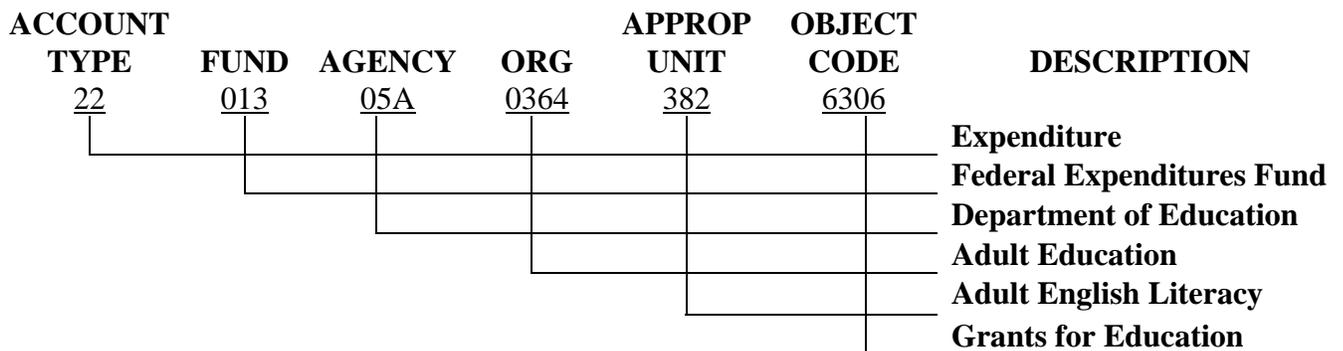
### GENERAL LEDGER/BALANCE SHEET ACCOUNTS



### REVENUE ACCOUNTS



### EXPENDITURE/EXPENSE ACCOUNTS



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**80.30.84 Required accounting steps**

- 80.30.84.a The initial step in processing accounting information consists of receiving a source document in electronic or paper form, analyzing the transaction to determine its nature and then assigning the appropriate coding. Documents initiating accounting transactions include cash receipts, invoices, purchase orders, and journal vouchers.
- 80.30.84.b Properly coded and approved source documents are segregated into similar transaction type groupings and posted sequentially in the MFASIS (Advantage) accounting system.
- 80.30.84.c Periodic financial reports are generated to support administrative and budgetary control. Examples of these reports include budget status report, accounts receivable aging report, and general ledger trial balance.
- 80.30.84.d Annually, statewide financial statements are prepared. Chapter 90 of this manual provides specific requirements and procedures for the production of the State's Comprehensive Annual Financial Report (CAFR).

Additionally, agencies may produce agency financial statements or reports. In doing so, they must use the information submitted to the MFASIS (Advantage) accounting system. Any variance between MFASIS (Advantage) data and agency issued financial statements is to be reconciled and disclosed in the notes to the agency's financial statements. However, if the separately issued statements use different reporting standards, the agency is to clearly indicate in the notes to the agency financial statements which standards were used and how they differ from those used in the State's CAFR.

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**80.30.86 Using standard or other accounting forms**

Standard forms have been developed and are prescribed for use by State agencies to support the accounting, budgeting and administrative functions.

Any revision by an agency to a standard form or the origination of a new form by an agency that is to be used as an accounting source document to support disbursements or collections of State funds must be approved in writing by the OSC prior to adoption. Overprinting, such as agency name and address, is not considered a revision and therefore is not subject to approval.

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**80.30.88 Requirements for agencies implementing, maintaining or modifying accounting or reporting systems**

- 80.30.88.a Any agency proposing to invest in agency financial or administrative systems must comply with the provisions of this manual and the rules prescribed by the Office of the State Controller, the Office of the Chief Information Officer and the Office of Information Technology. Financial data generated by agency systems must be compatible with the requirements of the centralized statewide systems operated by OSC.
- 80.30.88.b Enterprise-wide or multiple agency systems are the solutions of choice to meet the financial/administrative needs of State agencies. Any material changes to existing and all new agency unique financial/administrative systems should be discussed with OSC **prior to** beginning any significant investments in system development, enhancement, or acquisition, regardless of funding source.
- 80.30.88.c Agencies should develop an enterprise-wide opportunity assessment and business justification to include an evaluation of each of these alternatives:
1. Does a cost-effective, central-system solution exist?
  2. Can the agency be more flexible in how its needs are met; or can a central system be modified in a cost-effective, timely way to meet the needs?
  3. Can the needs be met by creating an agency-unique extension to a central system or central database rather than a completely new system?
  4. Does a partnership opportunity exist where one or more other agencies can join together to share in the creation of a new, shared system solution?
- 80.30.88.d Compliance with this Section facilitates the development of acceptable interface systems and minimizes the risk of developing incompatible systems that cannot be approved or implemented.

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**80.30.90      Budgetary data must be maintained**

Budgetary data is integrated in the uniform account code structure and is required to be maintained by each agency. The budgetary data is used to reflect budget operations such as estimated revenues, appropriations, allotments, and encumbrances.

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**80.30.92      Agency fiscal activities must be organized to provide effective internal control**

Agency fiscal activities are to be organized in such a manner as to provide the maximum degree of internal control in the most efficient and effective manner. Specific organization arrangements are left to the discretion of the agency; due to the diverse nature of State agency operations, examples will not be illustrated in this manual. Agencies are responsible for establishing and maintaining effective internal control over financial reporting. An agency's system of internal controls must comply with the internal control requirements prescribed in Chapter 20 of this manual.