



POLICY MANUAL
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TASSCC Policy Manual

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Purpose

Texas Association of State Systems for Computing and Communications (TASSCC) is established to encourage effective use of computing and communications resources in state agencies and public institutions of higher education in Texas as well as fostering communications and cooperation between state agencies.

Fiscal Year

The official fiscal year for TASSCC is September 1 – August 31.

Membership

TASSCC has two membership categories – full and associate. Each membership expires on August 31 of each year.

The dues schedule is as follows with annual review by the TASSCC Board of Directors:

Full Members	\$150 per fiscal year
Associate Members	\$300 per fiscal year

Full membership is available to state agencies and state-supported institutions of higher learning. Each full member organization will designate (as appropriate) one representative responsible for the annual membership renewal. Membership dues support the TASSCC Training Grants. Any IT professional from a state agency or institution of higher education may be eligible for a TASSCC Training Grant. Training Grants are available for an IT-related course or conference. The content delivery may be face-to-face, online, or computer-based.

Associate membership is available to any corporation, partnership or sole proprietorship that is engaged in either of these categories:

- A. Manufacture, sale or service of information processing telecommunications equipment and/or software, or
- B. Consulting, design and/or technical services in support of information processing or telecommunications equipment and/or software to government agencies or state supported school districts.

Each associate member will designate one associate representative who has managerial, engineering, technical or sales responsibility. Associate members cannot hold office.

Full members have voting privileges; associate members cannot vote. Voting privileges for full members include voting for TASSCC Officers and changes to the TASSCC Bylaws.

Sponsorship and Membership Policy

It is the policy of TASSCC that any sponsor who does not pay sponsorship dues for conferences or other educational events as outlined in the applicable sponsorship agreement will have their Associate Membership in TASSCC deactivated until such time as the outstanding balance is paid.

Attendee Rooms

Lodging for attendees to the Annual Conference may be subsidized if those attendees live in the immediate vicinity of the Annual Conference and would not be able to have their lodging paid for by their agency or higher education institution. This will be budgeted for each year in the TASSCC budget and approved for use by the TASSCC Executive Officers.

Executive Board Term of Service

The Executive Board of Directors includes the President, the President Elect, the Secretary, the Treasurer, the six Directors, and the immediate Past President. Term limits are imposed on officer positions via policies established by the Board of Directors. This will provide the opportunity for more members to become involved in leadership positions.

Executive Board Diversity

All efforts will be made to ensure the TASSCC Executive Board represents the make-up of the TASSCC Agency Membership, including Higher Education/State Agency, Large/Small Agencies and Higher Education Institutions, Information Resource Managers(IRMs)/Non-IRMs, Austin-based/non Austin-based.

Executive Board Term Limits

The term limit for the Directors is 6 years, or three continuous two-year terms. It is the intent that Officer positions are progressive, and no Officer shall stay in the same position for more than three continuous two-year terms.

Executive Board Meeting Attendance

Officers and Directors must ensure that there is sufficient time available to dedicate to the mission of TASSCC. This includes participation in TASSCC Board of Directors Meetings. Meetings are held monthly and attendance is tracked by the Management Company. Any Officer or Director who fails to attend three regular meetings of the Board of Directors in one year may be asked to resign from the Board. Meetings may be attended in person, via conference call (if available) or video conferencing (if available). Any form of attendance either in person or electronically (if available) will count as attendance for that meeting. In some cases it will be necessary to meet in person and no electronic means of attendance is required. In those cases attendance in person will be necessary to satisfy the attendance requirement.

Nominating Committee

The Nominating Committee is chaired by the Past President as stated in the TASSCC Bylaws. It will be made up of the current President Elect, the President, the past president and two senior volunteer board members. The Nominating Committee will assemble a Slate of Candidates (Slate) to be presented for a vote in August at the Annual Business Meeting. Any Board member interested in a position would be precluded from serving on the Nominating Committee.

Board Positions

In January of each year the Nominating Committee Chair will determine the board positions which are available for election in August of that year. Sitting board members will have the option to retain their position if they have not met the maximum service limit and are in good standing.

If a board position is or will become vacant, the committee will solicit candidates from TASSCC membership and will consider:

- Past involvement in TASSCC activities, such as attendance at events, participation in TASSCC committees,
- Longevity of TASSCC membership, and
- Other criteria as deemed appropriate.

The committee will also consider:

- A candidate's leadership position within their organization, and,
- The desire to ensure that the TASSCC board is representative of the TASSCC membership as a whole.

Secretary and Treasurer

Board members interested in serving as Secretary or Treasurer will be asked to submit a Statement of Interest. The Nominating Committee will then review the candidate submissions and select a Secretary and Treasurer to be added to the Slate.

President-Elect

The position of President-Elect will be nominated by the Nominating Committee and the President, President-elect, and Past President will make the final decision as to who is added to the final slate. It is preferred that the candidate should have served for a minimum of one (1) term as an Executive Officer of TASSCC.

Cash Management and Investment Policy

PURPOSE:

The cash flow of the Texas Association of State Systems for Computing and Communications (TASSCC) is, by nature, cyclical. There is a larger amount of cash on hand just before events, especially in the summer months of June, July and August leading up to the annual conference. This policy identifies the appropriate methods to ensure TASSCC can meet its cash requirements through prudent investment strategies and cash flow control.

CASH MANAGEMENT PROCEDURES

Receipts

The Management Company of TASSCC generates all invoices for membership dues, conference registration fees, sponsorships, and any other receivables due.

All checks received shall be made out to TASSCC and are sent to the address maintained by the Management Company, Post Office Box 1622, Austin, TX 78767. The Management Company retains a copy of each check received and its invoice. Bank deposits are posted to QuickBooks in the month they are deposited. All checks are deposited to TASSCC's checking account.

The Management Company is authorized to process credit card payments and credits as appropriate. Credit card payments are received either via an online payment through TASSCC's web site, phoned in, mailed in, or faxed. Credit card transactions are automatically deposited to TASSCC's checking account.

Many state agencies also choose to make payment via direct deposit which is posted directly into TASSCC's savings account. ACH deposits are made into savings to distinguish them from other deposits.

Payables

The Management Company receives invoices / statements, verifies the accuracy of charges, and generates a payment request form for approval. Upon approval the payment request is entered in Bill.com and coded to the proper account. Once all approvals are received, Bill.com will execute the payment request. When immediate payments are necessary a manual check showing the payee name and address, the amount paid, the account to which the expense is posted, and an explanation of the expense is sent. The check is attached to the original invoice. The bottom (voucher) portion of the check is attached to the original invoice, the check request (if required), and any back-up documentation, and filed in an accounts payable folder by month. Financial reports are presented to the Treasurer (or President in the absence of the Treasurer) for review/approval monthly.

The bank account shall have the following authorized signers: the President, the Treasurer and the Executive Director from the Management Company. All checks will require only one signature.

The Management Company enters invoice amounts into the accounting system per project budget general ledger accounts as of the invoice date. Checks are issued within the month they are received. If not, either the Management Company will pay the expense or an individual payment will be processed.

Requests by the Management Company for reimbursement of expenses, such as travel expenses, supplies or postage purchased, etc., are done via an expense report with documentation requested for any expense. The expense report is approved by the President or Treasurer. Each item is coded to coincide with budgeted accounts.

No corporate credit, debit card, or ATM access to TASSCC's funds is authorized.

Bank Statements

Monthly bank statements for all TASSCC bank accounts are mailed to the organization's PO Box.

Bank account reconciliations are prepared monthly by the Management Company, noting outstanding checks, deposits in transit, interest earned and bank credit card or other fees charged. Bank reconciliations are distributed to the Treasurer on a monthly basis.

Returned Checks

If a check deposited to TASSCC's account is dishonored, the bank will mail it to the PO Box. The Management Company will contact the payer to resolve the situation with an alternate payment method, and inform the payer that the amount due now includes the invoice amount plus bank fees incurred by TASSCC.

Budget

The Management Company reviews historical financial records and expected activities for the upcoming year and proposes a budget to the Board for comment/approval. After approval by the Board, the Management Company posts the details by account code for input to the accounting software. Monthly comparisons of financial activity to budget are

made by the Management Company and current monthly financial reports are provided to the Board at each Board meeting. The Management Company manages the activities of the association following the guidelines set by the budget.

IRS Reporting

The Management Company generates 1099 forms for payments over \$600 for speaker honorariums paid and for contract labor payments.

The Management Company will have the responsibility of overseeing the completion and filing of applicable tax returns and other information as required by the Internal Revenue Service. Any information submitted to the IRS will be reviewed by the TASSCC Board President prior to submission. Status of IRS correspondence will be presented at each regular Board meeting as necessary. The 990 is signed by the TASSCC President. The 990 forms from previous years are filed by the Management Company.

Record Keeping

All TASSCC records will be maintained by the Management Company. Any request for inspection will be handled by the Management Company and under no circumstances will original documents be removed.

Financial Audits

All TASSCC records will be audited by a Certified Public Accountant (CPA), every other year. The CPA will request information needed to conduct the audit from the Management Company and the TASSCC Board of Directors. The Audit Report will be presented to the TASSCC Board at a regular meeting following the completion of the audit or review.

Financial Records Retention

Documents to retain permanently:

- Accountant audit reports
- Cancelled Checks
- Charts of accounts
- General ledgers
- Contracts & Leases (valid and in effect)
- Minute Books, Bylaws, Articles of Incorporation, Policy Books
- Insurance Records
- Tax Returns w/all related documents

Documents to retain five years:

- Accident reports and claims (settled cases)
- Accounts payable and accounts receivable ledgers and schedules
- Contracts/leases (expired)
- Invoices
- Expense Analyses (e.g. budget vs. actual reports)

- Internal audit reports

Documents to retain three years:

- Expired insurance policies
- Bank reconciliation documents
- Bank deposit tickets
- Requisitions

INVESTMENT POLICY

PURPOSE:

The purpose of this policy is to direct the management of cash reserves, as well as the TASSCC Training Grant Fund. The goal of the Training Grant fund is to be self-sustaining. Funds management, as defined by this policy, is the effective and prudent management of reserved funds to achieve desired goals. Specifically, this Investment Policy will:

- Identify investment objectives.
- Establish acceptable investment guidelines.
- Specify investment authority and responsibility.
- Outline overall funds management strategies.

The Board believes a sound Investment Policy is essential to identifying funds management objectives, establishing funds management parameters, and to developing strategies that ensure the objectives and parameters of this entity are achieved.

Goals and Objectives for TASSCC Cash Reserves

Primary investment objectives are as follows:

- Protection of principal
- Maintenance of adequate liquidity
- Maximize return on cash reserves

The goal of this policy is to ensure that investments selected meet the objectives for principal protection, adequate liquidity, and that yield is maximized consistent with the parameters of safety, liquidity, and risk tolerance. Under no circumstances may an investment be financed or a margin account established.

The restricted reserves to be maintained in FDIC insured accounts should total \$200,000. The goal of the restricted reserves is to maintain sufficient funds to operate TASSCC for one year. Money market and savings accounts shall be limited in principal and interest amount to FDIC insurance ceilings (currently \$250,000).

The Management Company shall maintain the ability to sweep funds between cash reserve accounts in order to meet current obligations and maximize returns on cash reserves, but will not possess the ability to access funds.

For investment instruments with specified maturity dates (certificates of deposit), the maturities must be staggered to ensure the cash necessary for operations is available when required. Prior year activities and the operating budget should be used to estimate these requirements.

Goals and Objectives for TASSCC Training Grant Fund

Primary investment objectives are as follows:

- Maintenance of adequate liquidity
- Maximize return on investment

The goal of this policy is to ensure that investments selected meet the objectives for adequate liquidity and yield is maximized consistent with the parameters of safety, liquidity, and risk tolerance. Under no circumstances may an investment be financed or a margin account established.

INVESTMENT PROCEDURES

Annual Deposit of Funds into the TASSCC Training Grant Fund

At the end of each fiscal year after final reconciliation of the Profit and Loss for that fiscal year, the Board will determine if funds should be moved from the operating accounts into the investment accounts. The Treasurer will make a recommendation to the Board of the amount to be moved as well as the timing of the deposits.

Authorization

Investment responsibility will primarily reside with the Finance Committee as outlined in this Policy. The Finance Committee will be chaired by the current Treasurer with the following officers holding the authority to initiate investment transactions (purchase, sell, exchange) which conform to the parameters of the Investment Policy:

- President
- Treasurer

The Finance Committee Membership will consist of the President, Treasurer and Past President.

Reporting

All decisions of the Finance Committee will be reviewed by the Board at least semi-annually (January and June). On a semi-annual basis a summary of this entity's current position versus the respective guidelines for the following parameters established in the Investment Policy will be completed. This summary will be presented to the Board of Directors and will include the following information:

- Current Portfolio Mix
- Current Investment Strategy
- Prior Year results compared to an applicable index

Custody

All deliverable securities purchased for the portfolio will be held in safekeeping by an authorized financial institution.

Acceptable Investment Vehicles

Mutual Funds:

The Finance Committee will structure the Training Grant Funds portfolio with a bias toward intermediate and long-term capital appreciation. The portfolio should be structured with mutual funds that utilize both equity and fixed income positions. Selection of the appropriate mutual funds will usually be made on a criteria basis, which stresses the following:

1. Prior history
2. Morningstar rating
3. No front end or rear end loads

Diversification

The asset allocation of the Training Grant Fund should be flexible depending upon the outlook for the economy and the securities market. The following allocation guidelines should be followed:

	Minimum	Maximum
Fixed Income	0%	75%
Equity	0%	80%
Cash Equivalents	0%	100%

Prohibited Investment Actions

1. Speculation/hedging in the financial future market
2. Speculation/trading with the investment portfolio
3. Investing in individual equity securities
4. Any form of leverage

Investment Policy Review

The policy will be reviewed by the Board on an annual basis.

Travel

It is the policy of the TASSCC to pay for, or reimburse, all reasonable and necessary expenses incurred by a board member when travelling on TASSCC related business.

To be eligible for reimbursement for travel, outside of scheduled Board meetings, in accordance with this policy, all board members must receive either written or verbal approval by an Executive Board Member of TASSCC prior to the travel activity.

Transportation

TASSCC expects all travel arrangements (air and ground) to use the most reasonably efficient and economical mode of travel available at the time of booking. In instances of private vehicle use, reimbursement will be made for mileage at the current IRS maximum rate. Receipts are required for toll and parking fees, taxi cabs, buses and other modes of public transportation. TASSCC will reimburse the cost of mileage, at the approved rate, or a 14 day advance purchase airline ticket or rental car, whichever is less.

Lodging

Expenses for lodging will be reimbursed at the single room rate, unless pre-approved for double occupancy. An itemized hotel receipt must be provided, including an itemization for any room service charges to be paid/reimbursed by TASSCC.

Meal and Miscellaneous Allowance

The meal allowance for travel should not exceed current GSA per diem rates for travel location including tips. Tips will be paid at the accepted practice rate not to exceed 20%. Itemized receipts listing all items purchased must be provided. Excess amounts will not be reimbursed without the approval of a TASSCC executive board member. An allowance of up to \$10 per day, without requirement for receipts, or itemized account, will be allowed to cover vending machine purchases, bellhop tips, parking meters and other miscellaneous out-of-pocket costs.

Non-Allowable Expenses

Expenses or charges for the following will normally not be reimbursed and must be paid for by the board member:

- A) In-hotel pay television and movies
- B) Dry cleaning and laundry
- C) Health club and spas
- D) Expenses of a spouse or family member
- E) Alcoholic beverages

Request for Reimbursement and Return of Unexpended Funds

A complete accounting of all expenditures to be reimbursed by TASSCC should be included on the TASSCC Travel Summary form and forwarded to the Secretary/Treasurer for reimbursement. Receipts for all expenses, including hotel bills

and registration fees, must be attached to the summary form. Vendor invoices paid by members on behalf of TASSCC must be submitted with proof of payment.

Expenses Not Covered in Policy

TASSCC executive board approval must be obtained prior to any expenditure of funds for items or changes that are not specifically addressed in this travel reimbursement policy.

Recognition

When a past TASSCC Board Member or someone with whom TASSCC has worked closely retires from state service the Board may choose to grant that person complementary registration for an upcoming TASSCC Conference or other event. This recognition is at the discretion of the Board based on that person's contribution to TASSCC.

Association Management

TASSCC contracts with CMP Management to oversee the daily operations of the association. These duties include membership management, financial management, and managing the annual conference. The contract is reviewed and renewed annually.

Business Continuity

CMP Management has responsibility for all information related to membership management, financial management and conference related information. CMP's internal server hosts Exchange. Organization documents are hosted via a cloud solution. A daily backup of the entire server to a USB HDD occurs nightly. A daily email confirmation from the system is sent to assure this is completed. Two USB HDD drives are scheduled to be rotated weekly. The inactive HDD drive is maintained off-site. This provides the primary means for disaster recovery. So, for example, if the building burns down, a full backup of ALL data that is no more than a week old will be available.

A secondary solution to cover client file backups to a cloud server for redundant backup is currently being reviewed and tested. This only covers files and does not replace the USB HDD for Exchange/SharePoint/Server configuration.

Conflict of Interestⁱ

The purpose of the conflict of interest policy is to protect TASSCC's tax-exempt interest when it is negotiating financial decisions that might benefit the private interest of a board member. The policy is intended to supplement but not replace any state and federal laws governing conflict of interest applicable to nonprofit and charitable organizations.

POLICY

No member of the Board of Directors shall receive any personal profit or gain, directly or indirectly, through his or her participation in TASSCC.

No member of the Board shall obtain any list of clients for personal or private solicitation purposes at any time during the term of their affiliation.

PROCEDURES

Duty to Disclose

Each individual shall disclose to TASSCC any personal interest which he/she may have in any matter pending before the organization and shall refrain from participation in any decision on such matter.

After disclosure of the financial interest and all material facts, and after any discussion with the interested board member, he/she shall leave the governing board meeting while the determination of a conflict of interest is discussed and voted upon. The remaining board members shall decide if a conflict of interest exists.

If it is concluded that a conflict of interest exists, the board member with a conflict of interest may make a presentation at the board meeting. After the presentation, he/she shall leave the meeting during the discussion of, and the vote on, the particular transaction or arrangement.

Violations of the Conflicts of Interest Policy

If there is cause to believe a violation of this policy has been committed, the member shall be given an opportunity to explain the alleged failure to disclose. If a determination is made that the member did fail to disclose an actual conflict of interest, appropriate corrective actions will be taken.

Conflict of Interest Statement

At this time, I am a board member, committee member, or an employee of the following organizations:

Now this is to certify that I, except as described below, am not now nor at any time during the past year have been:

1) A participant, directly or indirectly, in any arrangement, agreement, investment, or other activity with any vendor, supplier, or other party doing business with TASSCC which has resulted or could result in personal benefit to me.

2) A recipient, directly or indirectly, of any salary payments or loans or gifts of any kind or any free service or discounts or other fees from or on behalf of any person or organization engaged in any transaction with TASSCC.

Any exceptions to 1 or 2 above are stated below with a full description of the transactions and of the interest, whether direct or indirect, which I have (or have had during the past year) in the persons or organizations having transactions with TASSCC.

Date: _____

Signature: _____

Printed: _____

Duty of Care

Duty of Care is the duty to consider the impact our actions can have on others. It is directly related to negligence.

The definition of negligence is “conduct that falls below the standard established by law for the protection of others against unreasonable risk of harm”.

Duty of Care also addresses Duty of Loyalty and Duty of Obedience.

Duty of Loyalty is defined as undivided allegiance to the association when making decisions about the association. Officers and directors must not put personal interests above the interests of TASSCC. Officers and directors must disclose even *potential* conflicts of interest to the board of directors, and should recuse themselves from deliberation and voting on matters in which they have personal interests.

Duty of Obedience states officers and directors are required to act in accordance with TASSCC’s articles of incorporation, bylaws and other governing documents, as well as all applicable laws and regulations.

Officers and directors must perform TASSCC’s duties in the same manner as an ordinarily prudent person would under similar circumstances. They must act in a manner that is in the best interest for the association.

The "business judgment rule" protects officers and directors from personal liability for actions made in poor judgment as long as there is a reasonable basis to indicate that the action was undertaken with due care and in good faith.

PROCEDURES

- Be informed before making decisions by researching and becoming familiar with the issue.
- Be actively involved in deliberations during board meetings - asking questions where prudent and when such a need is indicated by the circumstances.
- Make decisions based on information. Don’t be hasty.
- Meeting minutes must be accurate – and reflect the vote counts (including dissenting votes and abstentions) on actions taken at meetings.
- Request that legal consultation be sought on any matter that has unclear legal ramifications.
- Request that the association's accountants assess and evaluate any matter that has significant financial ramifications.
- Review the association’s financial reports - audited and unaudited.
- Attend the association's meetings and read the association's publications carefully to keep fully apprised of the organization's policies and activities.

- Review the association's articles of incorporation, bylaws and other governing documents regularly.
- Sign the conflict of interest document associated with the conflict of interest policy.

Legal Protection

If preventive risk management fails, the liability of association officers and directors can be limited through indemnification by the association, insurance purchased by the association, and state volunteer protection laws.

References:

https://en.wikipedia.org/wiki/Duty_of_care

<http://legal-dictionary.thefreedictionary.com/duty+of+care>

Whistleblowerⁱⁱ

TASSCC acknowledges that whistleblowing may be useful in guarding the organization's ethical standards. TASSCC encourages anyone to report information relating to illegal practices or violations of policies to the TASSCC Board. It is the responsibility of all board members to report concerns about violations of TASSCC's code of ethics or suspected violations of law or regulations that govern TASSCC's operations.

The Board recognizes the right of anyone to report any illegal practices to the proper authorities.

Investigation

TASSCC encourages anyone reporting an alleged violation to identify himself or herself when making a report in order to facilitate the investigation. However, reports may be submitted anonymously. Reports of suspected violations will be kept confidential with the understanding that confidentiality may not be maintained where identification is required by law.

The Board will appoint someone to investigate the complaint and prepare a written report to the board. A determination will also be made regarding legal counsel. The appointed investigator will protect the confidentiality of all persons entitled to protection.

The complainant (if identified) will receive an update regarding the proposed violation.

No Retaliation

It is contrary to the values of TASSCC for anyone to retaliate against any board member or member who in good faith reports an ethics violation or a suspected violation of law.

Social Media Policy

TASSCC recognizes that social networking and Internet services have become a common form of communications in today's environment. Social networks are online communities of people or organizations that share interests or activities and use a wide variety of Internet based technology to interact and share information with each other. TASSCC will use this policy to guide participation in social networks.

- TASSCC policies, Bylaws, and Mission will form the basis for the organization's use of social media.
- Protect individual privacy and the privacy of other TASSCC members. Follow all privacy protection laws and the TASSCC Privacy Policy.
- Follow all copyright laws, open records laws, retention laws, fair use and financial disclosure laws and any other laws that might apply.
- Do not use ethnic slurs, profanity, personal insults, or engage in any conduct that would not be acceptable in your workplace. Avoid comments or topics that may be considered objectionable or inflammatory.
- Frame any comments or responses in a respectful and positive manner. Do not argue with commenters. Be clear, but not defensive.
- Respect and maintain any confidentiality entrusted to you. Do not divulge or discuss proprietary information, personal details about other people or other confidential material.
- Open, respectful and honest comment and discussion is encouraged.
- Distinguish when you are voicing personal opinion and when you are speaking for TASSCC. Generally, members of the Board will speak for TASSCC as an organization.

Strategic Planning

TASSCC believes that yearly strategic planning will aid in the growth and development of the organization. As a result, TASSCC develops multi-year objectives that focus on members, service, innovation, finance, quality and growth. Each committee is assigned tasks with specific deadlines associated with the objectives.

Communications

TASSCC uses their Website (www.tasscc.org), Facebook, LinkedIn and Twitter to communicate with members.

Bereavement

To recognize the passing of those who have supported TASSCC, and their families, the following policy has been adopted:

- Immediate family of former board members will be sent a sympathy card.

- Currently serving board members and their immediate family – up to \$100 donation to charity.
- Former Board members – case by case.

Exceptions made be made to this policy at the discretion of the Board of Directors.

Volunteer Policy

TASSCC Members who volunteer in support of TASSCC events may apply for training grants to attend the events if funding is not provided by the member's agency.

Retirement Acknowledgement Policy

If an esteemed member of TASSCC retires, the TASSCC board may offer that member free registration to the next TASSCC event to be recognized.

Bylaws

TASSCC Bylaws - Last ratified June 2006

The bylaws are found online at www.tasscc.org.

Bylaws Revision

Amendments to bylaws can be made with a two-thirds majority of the voting membership. The vote can be taken electronically. The membership must be given 14 days' notice with a copy of the proposed amendment(s).

ⁱIRS: <http://www.irs.gov/instructions/i1023/ar03.html>, <http://form1023.org/nonprofit-conflict-of-interest-policy-and-agreement>

ⁱⁱ <http://www.councilofnonprofits.org/sites/default/files/Sample%20WhistleblowerPolicy%202.2010.pdf>