EXHIBIT 6
Financial Disclosure, Compliance, and Internal Controls

- Does the organization have an audit? Smaller organizations should be encouraged to have a review by an independent CPA. All nonprofits should consider requiring management to certify the accuracy and completeness of the financial reports.
- Does the audit committee work closely with the internal audit staff?
- Does the board or the audit committee meet periodically with the independent accountant without a member of management present?
- Are audit-firm lead partners rotated every five years?
- Does the organization have a written, mandatory document-retention and periodic-destruction policy? The policy should include guidelines for handling electronic files and voicemail.
- Does the organization have an adequate system of internal control?
- Has the existing internal control structure been documented and assessed for effectiveness?
- Does the organization have a reliable accounting system?
- Does the organization adhere to appropriate accounting standard guidance?
- Has the organization complied with AICPA Statement of Position 98-2, "Accounting for Costs of Activities of Not-for-Profit Organizations and State and Local Governmental Entities That Include Fundraising"?
- Does the organization have a code of ethics, and do all employees and directors embrace it?
- Does the organization have a system for confidential employee complaints (i.e., whistleblower protection)?
- Does the organization comply with all payroll-withholding tax laws?
- Have any trust-fund taxes (withheld from employees) been diverted to operating cash flow needs of the organization rather than forwarded to the U.S. Treasury or the state department of revenue?
- Is the organization producing unrelated-business income?
- Have the expenses reported on the organization's IRS Form 990 been properly allocated between program services, fundraising, and general and administrative?
- Have internal controls been established to support the organization's exempt status? Are these controls monitored effectively?
- Has the organization complied appropriately with the terms of donations and restricted funds?
- Have governance materials been posted to the organization's website to enhance transparency?
- Does the organization abide by the "Anti-Terrorist Financing Guidelines: Voluntary Best Practices for U.S. Based Charities"?
- Does the organization comply with laws affecting employers, including the ADA, OSHA, the Fair Labor Standards Act, FICA, COBRA, and the Family Medical Leave Act?
- Does the organization file an annual IRS Form 990 or 990PF? Form 990T?
- Does the organization provide substantiation for charitable contributions?
- Does the organization have policies and procedures to avoid destruction of documents that may be relevant to a federal government investigation?