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## **A. Record Keeping Requirements**

The purpose of this section is to provide a uniform system for maintaining and disposing of Coast Guard Mutual Assistance administrative and financial material.

### **1. CGMA Reference Material**

CGMA-HQ will develop and make available the following materials to each Representative. Representatives are responsible for reviewing the material and making it available to others as needed.

- CGMA Manual (CGMA Website)
- CGMA Annual Report (CGMA Website)
- CGMA Information Brochure (Mailed as Needed)
- Active Loan List (CMP)
- Assistance Summary Report (CMP)
- Restricted List (E-mailed Monthly)
- List of Representatives and Assistant Representatives (E-mailed Monthly)

### **2. Unit Files**

Coast Guard Mutual Assistance applications, documents, records, files, forms, reports and correspondence, shall be maintained separately from other files at the unit. At a minimum, the following items are to be retained within the unit's CGMA files.

- Appointment Letter for the Representative and each Assistant Representative
- Representative Certification Form (CGMA Form 20)
- Assistant Representative Certification Form (CGMA Form 20a)
- Audit Form (CGMA Form 21), if applicable
- A copy of the latest Bank of America - Bank Signature Card signed by every person at the unit with CGMA check signing authority

- Each CGMA-HQ letter assigning checks (CGMA Form 52) to the unit
- Any documentation pertinent to the administration of Coast Guard Mutual Assistance

### **3. Case Files**

All documents and information regarding an applicant is considered privileged information and shall be handled accordingly. No CGMA correspondence or loan records will be placed in official Coast Guard personnel files of an individual applying for, or receiving, CGMA assistance. (See section 1-H for additional information concerning CGMA's confidentiality policy.)

There are two basic methods for maintaining case files. Although the first method is preferred, both are acceptable. Representatives must decide which method will best suit their record keeping needs.

- A separate folder may be created for each case. All documents relating to the case will be placed into the file. These folders will be maintained in alphabetical order by last name, or
- All documents relating to each case are attached directly to the unit's copy of the CGMA Check (CGMA Form 52) issued to an individual. These documents will be filed in check number sequence

Regardless of the method chosen, at a minimum, the following items are to be kept with each case:

- The original CGMA Application for Assistance (CGMA Forms 1, 5 & 6) or Supplemental Education Grant (SEG) Application (CGMA Form 10) for every request received, including requests that were denied and those sent to the Executive Director for approval
- The original bottom section of each CGMA Check (CGMA Form 52) issued. (Do not destroy any checks, unless directed by CGMA-HQ.) When voiding a check, keep the bottom section of the check in the unit files
- Supporting documents, including copies of bills, estimates for repairs, Consumer Credit Counseling Service recommendations, HUD Form 1, and other related documentation
- Power of Attorney, Pre-Authorization Form, or statement of sponsor's consent when providing assistance to family members

#### **4. Disposal of Records**

Except as noted below, all CGMA administrative and financial records, including individual case files may be disposed of four years after the date of preparation.

They must be destroyed in a manner appropriate for personally identifiable information.

The following may be disposed of upon receipt of the replacement item:

- Restricted List
- CGMA Annual Report
- CGMA Information Brochure
- List of Representatives and Assistant Representatives

Unused Powers of Attorney and Pre-Authorization Forms may be disposed of once their expiration date has passed. Powers of Attorney and Pre-Authorization Forms that were used when providing assistance are to be attached to, and disposed with, the case file.

## B. Audits

The objectives of an audit are to confirm that the activities of the CGMA account being audited are effectively administered and that internal control measures are adequate.

### 1. Relief Audit

A Relief Audit is to be conducted every time a CGMA Representative or Assistant Representative is relieved, or assigned.

When possible, the incoming and outgoing CGMA Representatives or Assistant Representatives will conduct the Relief Audit simultaneously and are to complete and sign a Relief of CGMA Representative or Assistant Representative Audit Form (CGMA Form 21).

If it is not possible to conduct the audit simultaneously, the incoming Representative or Assistant Representative will complete the audit and indicate on the Relief of CGMA Representative or Assistant Representative Audit Form (CGMA Form 21) that the outgoing Representative or Assistant Representative was not available.

The distribution of the completed Relief of CGMA Representative or Assistant Representative Audit Form (CGMA Form 21), along with any comments, explanatory notes or description of actions taken to correct any discrepancies, will be as follows:

- In the case of a Representative being relieved
  - Copy to CGMA-HQ
  - Original retained by Incoming Representative
  - Copy retained by Outgoing Representative
  - Copy retained in unit's CGMA files
  
- In the case of an Assistant Representative being relieved
  - Original to the unit's Representative
  - Copy retained by Incoming Assistant Representative
  - Copy retained by Outgoing Assistant Representative
  - Copy retained in unit's CGMA files

### 2. Special Audits

The Board of Control, CGMA-HQ and Representatives may require that a Special Audit be conducted at any time the conditions warrant.

## C. Forms

### 1. General

The following forms have been adopted for use by CGMA:

CGMA 1	Quick Loan Application
CGMA 5	CGMA Application for Assistance
CGMA 6	CGMA Application for Disaster Assistance
CGMA 6a	CGMA Application for Conversion of Disaster Loan into a Grant
CGMA 7	Application for CGMA Layette
CGMA 8	Application for CGMA Stafford/PLUS Loan Origination Fee Reimbursement
CGMA 10	Application for CGMA Supplemental Education Grant (SEG)
CGMA 15	CGMA Budget Form
CGMA 16	Pre-Authorization Form
CGMA 17	CGMA Disapproval/Appeal Statement
CGMA 20	Representative Information and Certification Form
CGMA 20a	Assistant Representative Information and Certification Form
CGMA 21	Relief of Representative or Assistant Representative Audit Form
CGMA 22	CGMA/NFCC Agreement
CGMA 22a	CGMA Letter of Introduction
CGMA 22b	Counselor Recommendation Form
CGMA 41	Cash Contribution Form
CGMA 42	Memorial Contribution Form
CGMA 43	Active Duty Contribution Allotment Authorization Form
CGMA 44	Civilian Employee Contribution Allotment Authorization Form
CGMA 45	Retired Contribution Allotment Authorization Form
CGMA 46	Credit Card Contribution Form
CGMA 47	Securities Contribution Form
CGMA 52	CGMA Check
HUD-1	Settlement Statement
00-35-2653NSBW	Bank of America Corporate Signature Card

See appendix C for a copy of each of these forms.

### 2. Campaign Forms

In addition to the forms listed above, CGMA-HQ will prepare and distribute forms necessary to conduct the annual fundraising campaign. These forms will be sent directly to each Representative site and made available on the CGMA-HQ website ([www.cgmahq.org](http://www.cgmahq.org)) each year prior to the campaign.

### 3. Accountable Forms and Security

CGMA Checks (CGMA Form-52) are accountable and must be safeguarded at all times. At a minimum, these forms must be kept in a locked drawer or cabinet with access limited to authorized CGMA Representatives and Assistant Representatives.

An audit is to be conducted to account for all of the unit's CGMA Checks (CGMA Form 52) each time a unit's Representative or Assistant Representative changes (sealed packages do not have to be opened for this purpose). Units issuing a large volume of CGMA assistance and units having several Assistant Representatives may consider developing a log file to record each CGMA Check issued to help facilitate the audit process.

Missing CGMA Checks (CGMA Form 52) must be reported to the CGMA-HQ Executive Director, Director of Administration or Director of Finance as soon as the loss is discovered. (See paragraph 2-D-2 for CGMA-HQ contact information.)

### 4. Obtaining Forms

Non-Accountable Forms: are available to download from the CGMA website [www.cgmahq.org](http://www.cgmahq.org). CGMA forms may also be obtained by contacting the CGMA-HQ Administrative Assistant or Director of Administration. (See paragraph 2-D-2 for CGMA-HQ contact information.)

Accountable Forms: The following procedures have been established to obtain CGMA Checks (CGMA Form 52)

CGMA-HQ will automatically distribute checks to a location when the CGMA-CMP program indicates that the level of checks on hand is below what is needed.

CGMA-HQ will send the checks to Representatives via secure shipping methods. A letter for the assignment and receipt of the checks will accompany the checks.

Representatives are responsible for verifying that the checks arrived intact (sealed packages do not have to be opened for this purpose). The Representative is to complete the receipt portion of the letter and send it to CGMA-HQ, retaining a copy in their CGMA Unit File. See section C, above, for additional information concerning accountability and security of CGMA Checks (CGMA Form 52).

**Note:** Representatives anticipating a need for checks in addition to those automatically provided by CGMA-HQ are to contact the CGMA-HQ Administrative Assistant or Director of Administration. (See paragraph 2-D-2 for CGMA-HQ contact information.)

### **5. Printing Forms**

With the exception of CGMA Checks (CGMA Form 52), all forms should be printed locally.

## D. CGMA Reports

Each month, CGMA-HQ prepares and delivers via e-mail (or makes available electronically) a variety of reports concerning CGMA activities to each Representative, including:

- Active Loan List (CMP)
- Assistance Summary Report (CMP)
- Board of Control Minutes (CGMA Website)
- Restricted List (E-mailed Monthly)
- List of Representatives and Assistant Representatives (E-mailed Monthly)

Representatives and Assistant Representatives are expected to review each report to determine what, if any, actions are required and take those actions as necessary. A brief summary of each report follows.

### 1. Active Loan List

The Active Loan List contains account information for all clients who currently reside within a Representative's Area of Responsibility (AOR), who have an outstanding loan balance, regardless of where the assistance was originally provided. Delinquent accounts are displayed in red. The Active Loan List is displayed in real time.

The Active Loan List provides:

- Last Loan Date
- Last Loan Amount
- Last Payment Date
- Last Payment Amount
- Current Outstanding Loan Balance
- Client Type

Prior to providing assistance, Representatives are to review the Active Loan List (and the Restricted List if providing assistance offline) to determine the approval authority necessary to provide assistance. (See section 4-C for additional information concerning Representative Approval Authority.)

CGMA-HQ will automatically update the Active Loan List for active duty members as they are transferred from the AOR of one Representative to that of another Representative, by removing their account information from the former

Representative's Active Loan List and placing it on the Active Loan List of the Representative at their new location.

- Representatives may request changes in the Active Loan List for other clients who are no longer in their AOR by contacting the CGMA-HQ Director of Finance or Financial Assistant, to have the information transferred to the Active Loan List for the client's new location. (See paragraph 2-D-2 for CGMA-HQ contact information)

## **2. Assistance Summary Report**

This report shows all of the CGMA assistance (loans and grants) provided by each CGMA location for the current month and Year-to-Date (YTD).

The information on the Assistance Summary Report is very useful to answer the question, "How much assistance does CGMA provide?" Reporting options are as follows:

- **CATEGORY** – The reason clients need assistance. This shows the number of CGMA checks issued by the category of assistance
- **CAUSE** – The reasons clients do not have personal funds available to meet the current financial need
- **DISBURSEMENT** – Shows the breakdown between Loans, Personal Grants and SEG
- **BRANCH** – Shows the breakdown between Coast Guard clients and clients assisted from the other branches of the Armed Forces
- **TYPE** – Shows the breakdown of total assistance by client type
- **RANK** – Shows the breakdown of total assistance by pay grade/rank
- **TYPE-LOAN** – Shows the breakdown of total loans by client type
- **TYPE-P.GRANT** – Shows the breakdown of total personal grants by client type
- **TYPE-SEG** – Shows the breakdown of total SEG by client type

## **3. Restricted List**

CGMA maintains a list of clients who are restricted from receiving assistance without approval by CGMA-HQ. The individuals on the Restricted List have defaulted on their CGMA loan(s) and have failed to respond to CGMA's attempts

to reestablish loan payments. Therefore, CGMA-HQ has declared their account uncollectible, added them to the CGMA Restricted List, and may have turned their account over to a collection agency.

Representatives are not authorized to provide assistance to any client on the Restricted List or otherwise restricted in CMP, without authorization from CGMA-HQ. If the client's account is restricted contact CGMA-HQ.

**Note:** If CGMA-HQ cannot be contacted in time critical situations, Representatives may approve emergency assistance, as defined in paragraph 3-C-2, for clients on the restricted list, in extenuating circumstances for bona fide emergencies. This does not include "emergency in the mind of the client". If assistance is approved under these conditions, the check must be prepared offline (manually) and CGMA-HQ must be contacted as soon as possible.

See section 5-D for additional information concerning uncollectible loans and the CGMA Restricted List, including how and when clients are placed on the list and how they may be removed from the list.

#### **4. Board of Control Minutes**

The Minutes from the Board of Control meetings are the official records of the Board's actions. Minutes for the past 12 months are available on the CGMA website [www.cgmahq.org](http://www.cgmahq.org). The minutes of each Board meeting are posted upon approval by the Board at a subsequent monthly meeting. They contain information concerning Board activities, including cases reviewed by the Board, items under review, old and new business, policy and procedures changes, and other issues concerning CGMA. The minutes are a good barometer of action issues within CGMA and should be reviewed routinely by everyone associated with CGMA.

#### **5. List of Representatives and Assistant Representatives**

This report lists the CGMA Representative for each CGMA Location, along with any Assistant Representatives that may be designated.

- Representatives are to review this report upon receipt to verify its accuracy.
- Contact CGMA-HQ if changes are needed

## E. Credit Reports

Due to the financial nature of assistance provided by CGMA, there are times that CGMA must obtain information concerning CGMA clients from credit bureaus and other external sources. Because personal financial information is sensitive in nature, CGMA must ensure that only individuals with a need to know have access to the information. (See section 1-H for additional information concerning CGMA's confidentiality policies.)

The authorization for CGMA to obtain credit information is contained on the signed CGMA Application for Assistance (CGMA Form 5).

### 1. Purposes of Obtaining Credit Reports

CGMA may contact credit bureaus, and other sources, for the purposes of obtaining financial, address and telephone information concerning CGMA clients. This action may be taken:

- a. When it is deemed necessary to process requests for financial assistance. The information obtained may be used to:
  - Review and verify the financial data provided by the CGMA client at the time assistance is requested. (Misstatements on requests for assistance may be grounds for denial of assistance)
  - Aid in the decision to approve or deny a request for financial assistance
- b. When a client's CGMA account becomes delinquent, the information obtained may be used to notify the client that their CGMA account is delinquent, attempt to arrange for repayment prior to sending their account to a collection agency, and update CGMA files.

### 2. Policy

The Executive Director, Director of Finance and Director of Administration have the authority to obtain credit data when deemed necessary.

### 3. Restrictions

Credit data will be provided to the entire Board of Control only when it is deemed necessary for the proper consideration of cases forwarded for their determination.

Specific credit data will not be provided to Representatives. When Representatives request credit data, the Executive Director, Director of Finance or Director of Administration will obtain the credit data. Summary information will

be provided directly to the Representative, stating whether or not the data on the credit report and the client's budget form are in consonance.

Except as previously noted, data obtained will not be shared with other people or organizations.

Clients who have been denied assistance based on information contained in credit reports obtained by CGMA may be given a copy of the report upon request.

No other use of the data is authorized.

#### **4. Obtaining Credit Reports**

Representatives must contact the CGMA-HQ Executive Director, Director of Finance or Director of Administration to request credit summary information on a case-by-case basis, when a client requests financial assistance from CGMA and the case will be processed locally. (See paragraph 2-D-2 for CGMA-HQ contact information.) CGMA-HQ will provide summary information to the Representative.

CGMA-HQ will provide credit reports to the Mutual Assistance Committee or the Board of Control for cases forwarded to the Board for determination, when applicable.

The following information is necessary when requesting a credit report:

- Client's Full Name
- Client's Current Mailing Address

#### **F. Additional Information**

Questions, comments and recommendations concerning this chapter should be directed to the CGMA-HQ Executive Director, Director of Administration or Director of Finance. (See paragraph 2-D-2 for CGMA-HQ contact information.)