Concerns of Police Survivors, Inc. Standard Operating Procedures

1.0. NATIONAL BOARD

1.1. GENERAL DUTIES:

- A. Those officers serving as a voting member of the C.O.P.S. organization are the National President, Immediate Past National President, and nine Region Trustees. Those officers serving as non-voting members of the C.O.P.S. organization shall be the Executive Director and the Executive Director Emeritus.
- B. The Executive Director and the Executive Director Emeritus, as non-voting members, shall have voice during meetings but shall not have the right to make motions. They may, however, recommend actions for the National Board to consider.
- C. The National Chapter Liaison may be invited by the National President to attend and participate at a National Board Meeting but shall have no vote on any issue. However, he/she may recommend actions for the National Board to consider.
- D. In an emergency, the National President, with approval of the National Board, shall appoint a suitable temporary replacement for the Executive Director until a permanent Executive Director can be hired.
- E. The National Board shall submit complete Expense Reimbursement forms and Travel Reimbursement forms along with accompanying receipts within thirty (30) days to the National Office and maintain his/her own Board Expense Fund.
- F. The SOPs shall be changed in accordance with Bylaws Article XV "Special Rules of Order".

1.2. RESPONSIBILITIES OF THE NATIONAL PRESIDENT:

- A. Shall be the Chief Executive Officer (CEO), Presiding Officer of this organization and shall be acknowledged as the immediate supervisor of the Executive Director.
- B. In an emergency, the National President, with approval of the National Board, shall appoint a suitable temporary replacement for the Executive Director until a permanent Executive Director can be hired.
- C. Shall be the primary spokesperson of the organization.
- D. Shall preside at all C.O.P.S. conferences, meetings and activities of the C.O.P.S. members and at meetings of the National Board.
- E. Shall be available to the press and in the public eye.

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- F. Shall represent and promote C.O.P.S. at talk shows, press conferences, seminars, rallies, meetings, etc., in any way possible. Shall designate who will represent the organization in his/her absence.
- G. Shall be willing to write and present speeches and conduct seminars for the public, law enforcement, and survivors on behalf of C.O.P.S.
- H. Shall be available to travel.
- I. Shall submit his/her report 21 days prior to the: December/January National Board Meeting for the period of June 1 through October 31; July National Board Meeting for the period of November 1 through May 31.
- J. Shall be an ex-officio member of all committees, except the Nominations/Elections Committee and the Elections Audit Committee.
- K. Shall appoint the majority of any committee, committees, or any council formed, to inquire into any affair or matter concerning or affecting the organization.
- L. Shall be responsible for preparing the agenda for the National Board meetings.
- M. Shall be responsible for reviewing minutes, making corrections as necessary, prior to sending draft minutes to the National Board for approval.
- N. Shall be responsible for the President's Message in the C.O.P.S. Newsletters.
- O. Shall keep up-to-date on issues facing the law enforcement community concerning C.O.P.S.
- P. Shall oversee and approve the National Board's travel.
- Q. Shall convey to successor all unfinished business of the organization and all organization property in his/her possession.
- R. Shall perform other duties on behalf of the organization as deemed necessary.
- S. Shall attend social functions and network with attendees when representing C.O.P.S. at a conference.

1.3. RESPONSIBILITIES OF THE IMMEDIATE PAST PRESIDENT:

- A. Shall advise and assist the new National President during the transition period.
- B. Shall share with the new Board his/her insight from past experiences.
- C. Shall serve as an official spokesperson of the organization when designated.
- D. Shall be available for travel with approval by National President.

- E. Shall notify the National President and receive prior approval by completing the necessary forms for upcoming speaking engagements.
- F. Shall be willing to write and present speeches on behalf of C.O.P.S.
- G. Shall serve in an advisory capacity to the National Board.
- H. Shall Chair the Nominations/Elections Committee.
- I. Shall Chair the Past Leadership Committee.
- J. Shall be responsible for keeping Past Leadership Committee members apprised of activities and issues of the organization and will ensure that approved minutes are sent to the Past Leadership Committee from the National Office.
- K. Shall be responsible for swearing in new Board members immediately following the elections.
- L. Shall report to the National President 30 days prior to a Board meeting any matter wished to be added to the meeting agenda.
- M. Shall submit his/her report 21 days prior to the: December/January National Board Meeting for the period of June 1 through October 31; July National Board Meeting for the period of November 1 through May 31.
- N. If authorized to travel by the National President, shall attend social functions and network with attendees when representing C.O.P.S.

1.4. RESPONSIBILITIES OF CHAIR OF TRUSTEES:

- A. Shall perform other duties of Region Trustees.
- B. Shall act as President Pro Tem of the organization when necessary and shall replace the National President should the National President be unable or unwilling to fulfill his/her term of office.
- C. Follow up with Region Trustees to ensure they are functioning in their positions.

1.5. RESPONSIBILITIES OF REGION TRUSTEES:

- A. Shall be an official spokesperson of the organization when designated.
- B. Shall be available for travel within their region or designated by the National President.
- C. Shall be responsible for collection and dissemination of information relative to C.O.P.S. in their particular area.
- D. Shall notify the National Office of any reported line-of-duty death in his/her region.

- E. Shall work with region chapters to ensure contact with any law enforcement agency that has lost an officer to a line-of-duty death in their region.
- F. Shall establish and maintain contact with new and past survivors in his/her region.
- G. Shall be willing to write and present speeches on behalf of C.O.P.S.
- H. Shall complete and submit Travel Authorization form to the National President for prior approval.
- I. Ensure that a yearly audit of the financial records of National C.O.P.S. is conducted by a Certified Public Accountant (CPA).
- J. Shall be responsible for cultivating leads within his/her region for fund raising opportunities for the National C.O.P.S. organization. Shall contact local and regional law enforcement agencies offering information about C.O.P.S.
- K. Shall perform other duties on behalf of the organization as deemed necessary.
- L. Shall report to the National President 30 days prior to a Board meeting any matter wished to be added to the meeting agenda.
- M. Shall submit his/her report 21 days prior to the:

December/January National Board Meeting for the period of June 1 through October 31;

July National Board Meeting for the period of November 1 through May 31.

N. Shall attend social functions and network with attendees when representing C.O.P.S.

1.6. RESPONSIBILITIES OF THE EXECUTIVE DIRECTOR:

As an employee of the organization, working at the direction of the National Board, and a non-voting member of the National Board of Concerns of Police Survivors, Inc., the Executive Director shall:

- A. Reside near the C.O.P.S. National Office.
- B. Be an employee of the organization.
- C. Acknowledge the National President as his/her immediate supervisor.
- D. Be knowledgeable of the wants, needs, problems, and emotions of law enforcement life.
- E. Be responsible for administering all aspects of services provided to the membership of C.O.P.S.
- F. Be responsible for the everyday business of the organization including but not limited to the responsibility for hiring, discharging, overseeing, evaluating and directing the work of Standard Operating Procedure Section 1~ Page 4 of 8

- the office staff of the organization. All staff additions must be approved by the National Board and budgeted accordingly. This includes ensuring that all employer responsibilities required by Federal and State regulations are met.
- G. Work with the National Board to identify the need for, develop, implement or revise any policies and procedures that lead to effective leadership and management of the National organization and/or its chapters
- H. Work under the direction of the National Board to secure funding for any and all of the organization's programs. This includes, but is not limited to, writing grants and various inhouse fundraising that are vital to the organization's financial well-being.
- I. Develop, write, and/or oversee the production of newsletters for survivors and law enforcement agencies to educate and meet the psychological, financial, and legal support needs of America's law enforcement survivors. Ensure the newsletter is viewed by the Communications Committee to ensure quality of content.
- J. Oversee the planning and implementation of Weekends and Camps.
- K. Work with the National President of C.O.P.S. to develop the agenda and business to present to the National Board at regularly scheduled or special Board meetings each year.
- L. Shall submit his/her report 21 days prior to the: December/January National Board Meeting for the period of June 1 through October 31; July National Board Meeting for the period of November 1 through May 31.
- M. Develop training programs and curriculum for the Board, chapters, staff, and law enforcement personnel. Secure training facilities for various trainings required for the organization and its purposes.
- N. Provide daily oversight of the funds of the organization in accordance of the financial policy statement as approved by the National Board, and be responsible for the reporting of the financial status of the organization. Prepare budgets, direct staff to prepare quarterly and yearly financial reports, and file those reports with appropriate governmental agencies. This includes filing paperwork necessary to conduct C.O.P.S.' national fundraising activities.
- O. Oversee the work necessary to develop an annual list of officers killed in the line of duty according to our Mission Statement as listed in the Bylaws. Work with officials at PSOB, FBI, NLEOMF, and FOP to develop the list for National Police Week, benefits, and C.O.P.S. membership purposes.
- P. Work with various committees of the National Board to develop projects, policies and procedures for effective and efficient handling of the organization's business.
- Q. Serve as the Secretary, Recording Secretary, Treasurer, Chief Financial Officer, etc., as required for filing of paperwork with Federal, state, local governments and/or banking or investment institutions.

- R. Oversee all aspects of C.O.P.S.' activities for National Police Week; secure hotel blocks, transportation, prepare the conference agenda, hire consultants/counselors needed for the National Police Survivors' Conference and "C.O.P.S. Kids and Teens" program.
- S. Serves as the chairperson and recording secretary of the National Police Week Committee.
- T. Oversee the development of public relations materials for the organization and the printing and distribution of that material.
- U. Ensure the confidentiality of the organizational business and directed procedures of the organization.
- V. Ensure the safekeeping and updating of all organizational documents, policies and procedures, and require staff to ensure the confidentiality of survivor information and/or financial assistance paid to survivors.
- W. Ensure the organization has appropriate insurance coverage.
- X. Ensure an independent accounting firm conducts an annual audit and files appropriate Federal and state tax returns.
- Y. Be available for travel to represent the organization at programs, trainings, conferences, meetings, etc., as needed.
- Z. Work with Legal Counsel on any legal issues that may arise on behalf of the organization utilizing the National Board approved attorney.
- AA. Oversee staff and staff issues including employment and benefit issues and updating the Employee Handbook as directed by the National Board.
- BB. Sign all contracts for business purposes and ensure the organization adheres to contract requirements.
- CC. Oversee the work of C.O.P.S. employees ensuring the best possible representation of the organization is seen by the individuals served by the organization.
- DD. Oversee the organization's facilities, ensuring a comfortable working environment for all employees.
- EE. Have custody of the books, records, documents, and office paraphernalia and equipment, under the general authority and orders of the National President and the National Board.
- FF. Serve as an official spokesperson of the organization.
- GG. Designate a staff member to take and transcribe minutes of all conference calls and National Board meetings submitting same to the National President for addition or correction prior to issuing copies of these minutes to the National Board for final approval.
- HH. Safely keep the Bylaws of this organization and keep records of official amendments.

- II. Furnish a surety bond for the faithful performance of duty in such amount as shall be specified by the National Board.
- JJ. Deliver all organization possessions to their successor.
- KK. Work with Congress, Federal agencies, and various levels of government on behalf of C.O.P.S. membership.
- LL. Furnish copies of all quarterly financial reports and progress reports to the National President and National Board.
- MM. Be responsible for submitting paperwork required by funding agencies, taxing organizations, etc.
- NN. Attend social functions and network with attendees when representing C.O.P.S.
- 00. Create any new position(s) with prior approval from the National Board.
- PP. Perform other related duties as business requires for the good of the organization or as directed by the National Board.

1.7. RESPONSIBILITIES OF EXECUTIVE DIRECTOR EMERITUS:

- A. The Executive Director Emeritus shall serve on the C.O.P.S. Past Leadership Committee and serve as the liaison between the Past Leadership Committee and the C.O.P.S. National Board until such time she is unable or unwilling to serve.
- B. The Executive Director Emeritus shall serve as a member of the Advisory Committee.
- C. The Executive Director Emeritus can attend all Weekends and Camps as well as National Police Week events and conferences as coordinated with the Services Director.
- D. The Executive Director Emeritus can present the Traumas of Law Enforcement, and any other law enforcement training as a certified trainer.
- E. When attending National Police Week, Weekends and Camps, Conferences, Traumas of Law Enforcement and any other C.O.P.S. function the Executive Director Emeritus shall be available to network and further the mission of C.O.P.S.

1.8. RESPONSIBILITIES OF C.O.P.S. PAST LEADERSHIP COMMITTEE:

- A. The Immediate Past President shall chair the Past Leadership Committee. Past Leadership Committee members must be Past National Presidents who are ex-officio members of the National Board and the Executive Director Emeritus. Members of the committee shall be given the option to serve annually.
- B. Shall offer advice to the National Board so as to maintain consistency with the history and mission of C.O.P.S.

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C. The Past Leadership Committee will assist in bridging any communication gap between the National Board and the chapters.

1.9. RESPONSIBILITIES OF C.O.P.S. NATIONAL COMMITTEE CHAIRPERSONS:

- A. Be cognizant of the duties and responsibilities required when appointed as a Committee Chairperson and complete required Committee tasks in a professional manner.
- B. Shall submit his/her report 21 days prior to the: December/January National Board Meeting for the period of June 1 through October 31; July National Board Meeting for the period of November 1 through May 31.

SOP 1.2.I, 1.3.L., 1.5.M., 1.6.E and 1.7.12 amended May 11, 2016 SOP 1.2.I, 1.3..L, 1.5.M, 1.6.X., 1.7.12 and 1.10 amended July 7, 2016 SOP 1.6 amended September 15, 2016 SOP 1.2I, 1.3.L, 1.5.M., 1.6.X., 1.6.DD, 1.7.12., 1.10.B amended December 4, 2017 SOP 1.0 amended, Control #8313-01 – January 9, 2019 SOP 1.3.J. amended, Control # 9050-01 – February 25, 2019 SOP 1.6 and 1.7 amended July 24, 2025

2.0. NATIONAL OFFICE

2.1. GENERAL GUIDELINES:

- A. All employees of C.O.P.S. shall be hired by the Executive Director and shall meet the criteria set by the Executive Director with the National Board approval.
- B. All employees of C.O.P.S. will receive a copy of the Employee Handbook and will follow the guide set forth in such Handbook.

2.2. OFFICE RESPONSIBILITIES PERFORMED DAILY/AS NEEDED:

- A. Handle telephone calls and refer to appropriate staff members.
- B. Open and distribute mail to appropriate staff members.
- C. Update files as needed and create and maintain databases as needed.
- D. Produce and mail form letters to survivors and agencies as necessary from data received from the Department of Justice, news clippings, and reports from survivors.
- E. Process and mail form letters to survivors requesting additional family information to families whose officer's death has been ruled in the line of duty.
- F. Dictate, transcribe, draft, duplicate and mail correspondence.
- G. Process requests for information for Board, Chapters, survivors, agencies, the general public, media, etc.
- H. Handle requests from survivors addressing specific grief/benefits issues that may impede their grief.
- I. Refer survivors and/or general public calls to appropriate Board members, survivors, professionals, organizations, etc., to fill their need.
- J. Process, review, and authenticate bills, draw checks, and mail payments.
- K. Review direct mail campaign materials, copy, etc., to meet needs of the organization, the IRS, and Accounting Procedure 87-2 for joint cost allocations.
- L. Research and develop new programs, literature and information based on the changing needs of our survivors and law enforcement in general.
- M. Research and develop new means of fund raising to meet the needs of new programs.
- N. Develop new contacts in the law enforcement and business professions, secure volunteers, and assist chapters for the good of the C.O.P.S. organization.
- 0. Attend conferences, present seminars, and speak on behalf of the organization.

- P. Process direct mail pieces received at the National office. Produce thank-you letters to all donors who contribute over \$50 to C.O.P.S. through direct mail.
- Q. Process contributions to C.O.P.S. from citizens, businesses, corporations, etc., sending thank you letters and adding information to appropriate contributor data bases.
- R. Review existing policies and procedures and update as directed by the Board.
- S. Develop brochures, mail-outs on various activities of C.O.P.S. as needed, and prepare for mailing.
- T. Maintain office equipment and computer software and develop databases to meet the record keeping process of the organization.
- U. Maintain stock of office supplies, merchandise and resource materials and order necessary items to replenish stock.
- V. Pack and ship materials for conferences, trainings, etc.
- W. Maintain the filing system of the organization.
- X. Perform any other additional duties as directed.

2.3. OFFICE RESPONSIBILITIES PERFORMED WEEKLY:

- A. Prepare bank deposits for donations, merchandise sales, etc. Process includes typing report, deposit ticket, stamping checks, copying checks, and entering checks into database.
- B. Maintain daily logs of funds expended on behalf of the organization from all accounts (General Account, Money-Market Account, "C.O.P.S. Kids" Account, JAAFF Account, etc.).
- C. Maintain general ledgers for the organization and handle cost allocation of all expenses for all accounts.

2.4. OFFICE RESPONSIBILITIES PERFORMED BI-WEEKLY:

A. Maintain personnel files, time sheets, and prepare payroll.

2.5. OFFICE RESPONSIBILITIES PERFORMED MONTHLY:

- A. Compare reports on line-of-duty deaths with PSOB, FBI, FOP and NLEOMF reports.
- B. Prepare labels and envelopes to mail anniversary cards to survivors.
- C. Prepare reports for Board members and chapters on line-of-duty deaths.
- D. Enter payables, receivables, and journal entries into automated accounting system.

- E. Reconcile all bank accounts of the organization and prepare monthly financial statements.
- F. Prepare State and Federal payroll returns.
- G. Keep appropriate records and handle necessary correspondence regarding C.O.P.S. merchandise.

2.6. OTHER OFFICE RESPONSIBILITIES:

- A. Gather information, write articles and oversee production of a newsletter and/or magazine. Ensure newsletter and/or magazine is sent to everyone in the C.O.P.S. database at least three (3) times per calendar year.
- B. Prepare forms, disseminate forms, seek volunteers to serve on selection committee, review applications, and prepare applications for review by Scholarship Committee. Prepare letter of notice to recipients, institution of higher learning, and disburse funds for scholarship recipients.
- C. Write and distribute press releases to Media mailing list.
- D. Prepare press releases written for subject or area specificity.
- E. Prepare and distribute quarterly financial statements for the organization.
- F. Prepare financial and progress reports for Department of Justice grants.
- G. Handle all aspects of preparation for Board Meetings. Prepare Board Meeting minutes for review of National President, prepare copies for Board Members, and update any policies that may have been changed as a result of that Board Meeting.
- H. Prepare Rap Sheet, an electronic and/or paper newsletter for law enforcement agencies four (4) times per calendar year.

2.7. OFFICE RESPONSIBILITIES PERFORMED YEARLY:

- A. Perform National Police Week preparations including planning of seminars, coordination of all activities for survivor participation, mail invitations and information, coordinate volunteers, hire professional counselors, find support personnel, develop Seminar Program, handle participant responses, etc.
- B. Prepare reports, correspondence, and distribute cash payments to eligible surviving families from the Japanese/American Friends of Law Enforcement Foundation (JAFLEF) grant.
- C. Prepare reports, correspondence, and cash payments to eligible surviving families that do not receive financial assistance from the JAFLEF grant.
- D. Organize, publicize, and handle paperwork involved with Weekends and Camps.
- E. Prepare annual financial statements and annual reports.

- F. Prepare state registrations for permits to conduct solicitation in states and regions where required.
- G. Prepare annual budget, cash projections, project expense reports and use of cash reports.
- H. Ensure a yearly audit by a certified public accountant is performed on all accounts of the organization.
- I. Prepare W-2 forms for employees and 1099's for contract employees of C.O.P.S.
- J. Plan and carry out the "Blue Ribbon Campaign" in support of law enforcement.
- K. Plan and carry out "Project Blue Light" in support of law enforcement.
- L. Prepare report for the IRS listing official C.O.P.S. chapters covered by C.O.P.S. group exemption.

SOP 2.1.A Approved by Board vote on July 16, 2020 (Control # 0189-01) SOP 2.6. Title, 2.6.A, and 2.6.H Approved by Board vote on May 9, 2022 (Control #2054-01) SOP 2.7 amended July 24,2025

3.0. <u>CHAPTERS</u>

3.1. SCOPE:

Chapters of Concerns of Police Survivors, Inc. (C.O.P.S.) are subsidiary organizations to National Concerns of Police Survivors, Inc. This Standard Operating Procedure (SOP) establishes policy and guidelines for chapters of National C.O.P.S.

3.2. GUIDELINES FOR STARTING A C.O.P.S. CHAPTER:

The purpose of a chapter is to create an organized action that promotes the mission of C.O.P.S. within an approved boundary. The mission of C.O.P.S. is rebuilding shattered lives of survivors and co-workers affected by line of duty deaths. Individuals desiring to establish a C.O.P.S. chapter in their community and/or state shall do so by following the *Guidelines for Starting and Running a Healthy C.O.P.S. Chapter* (Addendum #1A).

- A. Any member as defined in the Chapter Bylaws, Article III, Membership, Section 1 and 2 are eligible to start a chapter. Affiliate memberships such as local law enforcement personnel, business leaders, and citizens who are interested in the work of C.O.P.S. may also start a chapter. However, Affiliate Members shall not be eligible to vote or hold office.
- B. To start a chapter there must be fifteen dedicated people who are line of duty death survivors. These survivors must be at least one year out from their officer's death and at least 18 years of age. Interested people who are not survivors may assist the chapter as Affiliate Members. The applicants can be from the same family of the fallen officer; however, when the Chapter Board positions are elected no more than one survivor of the same fallen officer may serve on the Chapter Board in a voting role.
- C. Individuals desiring to establish a chapter shall contact the National Chapter Liaison (NCL) at the C.O.P.S. National Office and request a *Chapter Development Packet 1* (Addendum #1).
- D. The NCL will consider the following in the approval of an application:
 - 1. The number of applicants who have attended the C.O.P.S. National Police Survivors' Conference at National Police Week in Washington, D.C.;
 - 2. The number of applicants who have attended at least one Weekend or Camp for which they are eligible; and
 - 3. The number of applicants who have attended a Traumas of Law Enforcement (TLE) Training. Attendance at these C.O.P.S. programs or training is subject to consideration but is not necessarily a requirement.
- E. The NCL will review the completed application and give recommendations to the C.O.P.S. National Board regarding the feasibility of the proposed chapter. The C.O.P.S. National Board will vote to determine whether or not to accept the application and proceed further with chartering the proposed chapter.
- F. Once the initial application has been accepted, a *Chapter Development Packet 2* (Addendum #2), will be sent to the applicants and the process of chartering a chapter will begin and should take no more than six months.

- G. Once all necessary paperwork is completed, a vote will be taken by the C.O.P.S. National Board to present a charter to the newly-designated chapter.
- H. The newly chartered chapter will schedule a Business Meeting notifying the current membership in writing, mail and/or email a minimum of 30 days in advance. At this Business Meeting, the Chapter Board will be elected by majority vote of the members present.

3.3. RESPONSIBILITIES OF THE CHAPTER:

A. RESPONDING TO LINE OF DUTY DEATH (LODD):

As a C.O.P.S. Chapter, a designee of the chapter must respond to line of duty deaths (LODD) in their Chapter region. When a LODD occurs:

- 1. Any member upon hearing of a LODD should notify the Chapter President. The Chapter President shall notify the Region Trustee unless the Chapter has predetermined who will respond to all LODD, e.g., Funeral Response Team.
- 2. The Chapter President shall call a meeting (in person or virtual) with the Chapter Board to discuss the designee.
- 3. The designee shall reach out to the law enforcement agency and offer the support of the chapter. Examples of support provided could be offering to assist with funeral planning, meeting with the family, care for struggling co-workers, etc. This may vary by the agency's preferences, relationship the chapter has with the agency and the capacity of the chapter.
- 4. The chapter should reach out to the Region Trustee and the C.O.P.S. National Office if the agency requests support that is beyond the chapter's ability or capacity.
- 5. C.O.P.S. believes it is the hiring agency/employer's responsibility to notify the family of the death of the officer. No details of the death shall be announced by the chapter until the agency has formally announced the death.
- 6. Before responding as a C.O.P.S. Chapter to an officer/agent death, the agency must have made an official public statement of the death and its circumstances that indicate whether or not the death was in the line of duty. A final LODD determination may not be decided until a much later time. C.O.P.S. does not determine LODD (per Bylaws Article III) however the National C.O.P.S. office is available as needed for Chapter support.
- 7. The Chapter President or designee should notify chapter members of the details of the funeral and ensure there is chapter representation at the funeral services.
- 8. After the funeral services, and when the time seems appropriate, the chapter should follow-up with the family offering peer support. It is sometimes beneficial to link chapter members of the same survivor group to the individual family members needing assistance.
- 9. Within two weeks of the death or when the time seems appropriate, the Chapter President or designee should ensure that the agency and the family have the benefits packets (PSOB, state and others) and assistance is offered in the filing of the benefits.
 - a. Chapter members should be reminded not to make promises concerning LODD designation or benefits.
 - b. If the Chapter is not able to assist with filing benefits, they shall contact the National Office for assistance through the National Chapter Liaison or Director of Chapter & Survivor Support.

- 10. The goal of the Chapter is to gather the survivor information to complete the following forms within two weeks following the funeral, the Chapter President or designee shall attempt to provide the National Office:
 - a. The Survivor Contact Form (Addendum #3A)
 - b. The Co-Worker Contact Form (Addendum #3B)
 - c. The Officer Statistic Form (Addendum #3C)
- 11. The initiating C.O.P.S. Chapter located in the regional area of the officer's agency is the chapter that responds to that LODD. National C.O.P.S. recognizes that there will be occasions when a LODD may occur and there may be questions as to which chapter should initially respond. If that is the case the following procedure should be followed:
 - a. Contact your Region Trustee within 24 hours of the LODD to discuss who is to respond to the LODD, if in question.
 - b. The Region Trustee shall contact the National Chapter Liaison to discuss the responding Chapter and make a final determination.
 - c. Once a determination has been made, the Region Trustee shall notify both Chapters in question of the determination.
- 12. There are also times where survivors of the fallen officer will live in different chapter areas. The chapter where the agency is located is the primary responding area for the purposes of initial aftermath of the death and the funeral. When family members reside in different chapter areas, the respective chapters are encouraged to work together to ensure that the family members are well supported. At a minimum, the primary responding chapter should notify other chapters that they have a new survivor in their area that will require follow-up peer support and chapter services.
- 13. When a LODD occurs in an area without chapter representation, the Region Trustee together with the National Chapter Liaison will meet and assign a chapter to assist, or the Region Trustee will assist.

B. DEFINITIONS:

"Initiating Chapter" refers to the chapter having initial contact with the department/agency.

3.4. PEER SUPPORT:

- A. One of the founding principles of C.O.P.S. is peer support. Peer support occurs when people with similar experiences are able to listen, give hope and guidance to those in need of help and support. Chapters are expected to provide continuing peer support for their members in the manner the chapter best sees fit to provide this support. For example, chapters could host social functions, peer support meetings, individual outreach, tributes, etc. Chapters shall also strongly encourage attendance at National C.O.P.S. Weekends and Camps.
- B. The Chapter President or designee shall assist families in the planning for the National Police Survivors' Conference during National Police Week to include participating in C.O.P.S. conference sessions and Weekends and Camps.

3.5. COMMUNITY AWARENESS:

The Chapter shall engage in partnerships and public relations activities with their community and local law enforcement agencies to promote C.O.P.S. and its mission. For example:

participating in the Law Enforcement Appreciation Day (L.E.A.D.), Blue Blood Drive, Project Blue Light, and local memorial and tribute services, etc.

3.6. TRAINING:

- A. Chapters will engage in continual training to remain current and in compliance with national standards and to continue to improve in services they are able to provide. Chapter Board members must have attended a C.O.P.S. National Police Survivors' Conference at National Police Week (NPW). They are strongly encouraged to attend at least one of their eligible Weekends or Camps before or at any time during their term of office. It is encouraged they attend other programs or trainings offered by C.O.P.S. at any time during their term of office.
- B. **Board/Chapter Training:** C.O.P.S. must rely on its chapters to provide immediate support to surviving law enforcement families and ensure C.O.P.S. business is conducted in a professional manner at the grassroots level. This training is provided to help chapter leadership understand how their business practices reflect on the national organization and vice versa. This training may be provided either in person or virtually. The National Board will determine which format will be used at least six (6) months in advance of the training.
 - 1. In person requirements and expectations:
 - a. Chapters are required to send one representative to participate in the annual Board/Chapter Training. If a chapter has a new Board member, it is highly recommended that the new Board member attend this training during their first term to familiarize themselves with the business side of running a chapter.
 - b. The cost (airfare/mileage [whichever is less expensive], most meals and lodging) for two representative's participation in the training will be met by National C.O.P.S. through a reimbursement process. If the chapter wants to send more than two representatives, they should first request approval of the National Office. The chapter will be responsible for the additional costs.
 - c. The Chapter is required to register the participant(s) with the C.O.P.S. National Office prior to the registration deadline.
 - d. The chapter is required to arrange for transportation at least 30 days prior to the start of Board/Chapter Training to ensure that National C.O.P.S. is paying reasonable transportation costs for the representative's attendance.
 - e. Once at Board/Chapter Training, the chapter representative will provide the receipts for travel to the designated National C.O.P.S. staff member to apply for reimbursement.
 - f. Reimbursements for travel costs will be sent to the participant(s) or the chapter (depending on who fronted the travel costs) within two weeks following the completion of the training.
 - g. Failure to send a representative to the in person training will result in a \$500.00 fine payable immediately following the training.
 - 2. Virtual requirements and expectations:
 - a. Virtual Training will be held on a quarterly basis. Each quarterly session will be limited to 90 minutes.

- b. Chapters are required to have all voting board members participate in the virtual sessions. Attendance at the sessions is unlimited so chapters are encouraged to have multiple participants.
- c. The trainings will be recorded and will be accessible to chapters.
- d. The trainings will be interactive to gauge participation.
- e. Failure to have a representative participate in virtual training will result in a \$100.00 fine per quarter. The chapter has the opportunity to view the recorded training and successfully complete the quiz within 60 days to avoid the fine.
- 3. If a chapter feels that it has extenuating circumstances that warrants an exception to the payment of a penalty fee, the Chapter President may request an exception to policy to the NCL to waive the payment of the penalty fee. If the chapter does not agree with the decision of the NCL, it can appeal this decision to the C.O.P.S. National Board.
- C. **Virtual Learning:** Online training, when available, may be accessible to chapter members. If the E-Learning is made mandatory by National C.O.P.S., the chapter officers who fail to comply may be subject to removal from their position on the Chapter Board.

3.7. PUBLIC SAFETY OFFICERS' BENEFITS TRAINING (PSOB):

The C.O.P.S. National Office hosts Public Safety Officers' Benefits Program training. These trainings are for C.O.P.S. chapter representatives, qualified survivors, and law enforcement officers held at various times and locations throughout the year.

3.8. TRAUMAS OF LAW ENFORCEMENT (TLE):

Traumas of Law Enforcement Training provides free training to America's law enforcement agencies on how to appropriately respond to officers and their families affected by line of duty death. This training will also present information regarding appropriate response to officers handling critical incident trauma, disability, and law enforcement officer suicide. Chapter members are encouraged to attend and participate in TLEs in their areas. There is no cost to the chapter to attend this training other than the travel and lodging expense. Registration is required.

3.9. HOSTING/LOCAL PRESENTATIONS:

In order to promote awareness of survivor issues, chapter members may present to audiences his/her personal survivor experience, chapter business and C.O.P.S. survivor benefits. In order to keep our message consistent, trainings over two hours must have prior approval with the National President or Executive Director, but are normally reserved for certified C.O.P.S. trainers. The process to become a certified C.O.P.S. trainer is outlined in SOP 7.0. The TLE is proprietary training of C.O.P.S. which can be conducted only through the C.O.P.S. National Office by certified trainers.

3.10. CRITICAL INCIDENT STRESS MANAGEMENT (CISM):

Critical Incident Stress Management is a two-day training program such as "Individual Crisis Intervention and Peer Support". This training will provide C.O.P.S. members, chapter

representatives, chapter board members, and National board members with the tools and resources needed to provide support to law enforcement surviving family members, affected agencies, and co-workers at the local level. Crisis intervention is NOT psychotherapy, rather, it is a specialized acute emergency mental health intervention which requires specialized training. This course is designed for anyone who desires to increase their knowledge of individual (one-on-one) crisis/peer support intervention techniques.

3.11. FIDUCIARY RESPONSIBILITY/ACCOUNTING PROCEDURES:

- A. In order to uphold the highest standards and ensure the integrity, honesty, and reputation of the entire C.O.P.S. organization, the chapter must comply with the provisions of the *Financial Ethics & Accountability Form* (Addendum#4).
- B. Chapter Board members are required to read and commit by signing the *Financial Ethics & Accountability Form.*
- C. Chapter Financial Review Committee:
 - 1. Each chapter shall have a properly constituted Financial Review Committee. The Committee shall consist of at least two or more members.
 - 2. The Chapter Financial Review Committee is a committee which is responsible for oversight of the chapter's financial operations and reporting.
 - 3. It is an operating committee of the Chapter Board charged with oversight of financial reporting and disclosure. Their primary responsibility is to provide an objective and unbiased view of the chapter's practices. If necessary, the Audit Committee is empowered to acquire the consulting resources and expertise deemed necessary to perform their responsibilities with the approval of the Chapter Board. It also has oversight of regulatory compliance and risk management activities of a chapter.
 - 4. Ideally, the Committee will be composed of independent "outside" individuals (individuals not members of the chapter); however, a chapter may opt to have all chapter members or a combination of "outside" individuals and chapter members, with at least one who has a financial or accounting background or knowledge. Chapter members selected to be on the Committee shall not be voting members of the Chapter Board. The Committee is composed of individuals working independently from all operation and operating activities of the chapter. Independence refers to both independence from operation and independence from any kind of interest involved with the day-to-day financial operations of the chapter. The Committee does not have to approve every expenditure of the chapter but is in place to provide financial guidance and oversight as needed. The Committee is to ensure transparency of financial matters and that the audit process is neutral by removing the conflict of interest. The Chairperson is designated by the Chapter President with approval of the Chapter Board.
 - 5. The Committee shall be approved by the Chapter Board. Committee members do not have to be survivors but should be familiar with financial reporting and/or bookkeeping. There shall be no chapter officer, voting Chapter Board member, or anyone associated with approving funds for any chapter expenditures on the Committee. The Committee is used to verify that their Chapter Officers and Board members are using the correct internal protocol for financial reporting items. In addition, the membership and/or Chapter Board will rely on this Committee to help create financial reporting procedures as well.

- D. Chapters must complete an Annual Audit if their net worth is \$200,000.00 or more. Chapters with a net worth below \$200.00.00 must complete a Financial Review using the Financial Review for Chapters with a Net Worth Below \$200,00.00 Form. The period for the Audit or Financial Review of the chapter's financial records is for the fiscal year beginning April 1 and ending March 31. The Audit or Financial Review must be completed and reported/submitted to the Chapter Board and to the National C.O.P.S. Office no later than July 31. Details of the Annual Audit or Financial Review are found on the Financial Ethics & Accountability Form (Addendum#4).
- E. By August 15, each chapter will file an annual IRS return, either an IRS Form 990, an IRS Form 990-EZ or an IRS Form 990-N (e-Postcard), with the IRS.
- F. The chapter must forward copies of the chapter's IRS 990 report to the National Chapter Liaison by July 31 each year.

3.12. DISCIPLINARY ACTION:

- A. National C.O.P.S. understands the importance of filing the appropriate paperwork with the National Office in a timely manner. National C.O.P.S. also understands that on an annual basis the Federal IRS guidelines, specific state guidelines, and the Financial Review or Annual Audit must be met by each chapter. Also, Business Meetings shall be held at least quarterly within each chapter and the minutes filed. The financial statements of the chapter must also be filed each quarter. The required paperwork is specified in the chapter Bylaws and summarized in the Calendar of Paperwork Due Dates (Addendum # 7). This Standard Operating Procedure sets policy for this stated paperwork. All questions regarding chapter paperwork should be directed to the National Chapter Liaison.
- B. The National Chapter Liaison can make recommendations to the National Board to remove and appoint officers in a chapter if the circumstances warrant the action. The recommendation(s), if approved by the National Board would be forwarded to the Chapter Board and then acted upon by the NCL.
- C. When a chapter fails to submit quarterly documents as required:
 - 1. First quarter missed, the chapter will receive a phone call to the primary contact from the NCL.
 - 2. Two consecutive quarters missed, the chapter will be given notice by e-mail from the NCL.
 - 3. Three consecutive quarters missed, the chapter will be sent written notice by certified mail from the NCL.
 - 4. Four quarters missed or more, the chapter will be disbanded.
- D. When a chapter fails to submit annual reports as required:
 - 1. After 30 days, the chapter will receive a phone call to the primary contact from the NCL.
 - 2. After 60 days, the chapter will be given notice by e-mail from the NCL.
 - 3. After 90 days, the chapter will be sent written notice by certified mail from the NCL.
 - 4. After twelve months, the chapter will be disbanded.

- E. When a chapter is notified by e-mail, every Chapter Board officer and its Region Trustee will be sent the notice. A request for delivery and read receipts will be included.
- F. When a chapter is notified in writing by certified mail every Chapter Board officer will be sent the notice. A return receipt will be requested.
- G. The Standard Operating Procedure for disbanding (paragraph 3.15 below) will be followed if it is determined the chapter will be disbanded.

3.13. VOTING/ELECTION PROCEDURES/CAMPAIGNING:

- A. National C.O.P.S. understands the importance of using parliamentary procedure to conduct meetings by following Robert's Rules of Order Newly Revised. C.O.P.S. also understands the need to define the varying types of members within our organization and their voting rights within a local chapter meeting. This Standard Operating Procedure sets policy for categories of members and voting privileges they may be afforded within the organization.
 - 1. To be registered as a member (as defined in the Bylaws, Article III Membership) of Concerns of Police Survivors, the survivor must be registered in the C.O.P.S. National Office database. The survivor must make it known to National with which chapter they desire membership.
 - 2. Anyone wishing to be nominated for an elected office shall be present at the Business Meeting prior to the Annual Meeting in order to be nominated, unless pre-approved absence by the C.O.P.S. National President or C.O.P.S. Executive Director.
 - 3. To be eligible to vote, a survivor, as defined in the Chapter Bylaws, Article III, Sections 1 and 2 must be at least 18 years of age and registered in the National database with the chapter as a member no less than 30 days prior to any vote being cast. A survivor can have voting privileges in only one chapter at any one time.
 - 4. Affiliate memberships may be made available to local law enforcement officers, business leaders, and citizens who are interested in the work of C.O.P.S., even though they may not have been affected by the line-of-duty death of a law enforcement officer. Affiliate members shall not be eligible to vote or hold office.
 - 5. Immediately following chapter elections, the Chapter Board will submit the following:
 - a. Financial Ethics and Accountability form (Addendum #4);
 - b. Signed and notarized C.O.P.S. Confidentiality & Nominee Pledge Information form (Addendum # 5);
 - c. C.O.P.S. Chapter Officer Roster Form (Addendum #6); and
 - d. Meeting minutes including the election results.
- B. Terms for elected Board Members shall begin on April 1st following the elections, or if elected at a special election, shall be effective immediately following the special election.
- C. Appointed Board Members terms shall begin immediately upon appointment. Appointed Board Members have no voting privileges and may not make any motions, but have the right to voice opinions. This only applies to a non-voting appointed position. If the president, with the approval of the chapter board, makes an appointment to a voting position, the appointed individual is qualified to vote.
- D. Campaigning for any Chapter Elected Position:

- 1. Nominees may campaign to introduce themselves and allow the general membership to get to know them provided they follow these guidelines:
 - a. Nominees may not refer to their opponents in any way. Negativity and mudslinging will not be tolerated.
 - b. All campaigning must be centered on educating their general membership on who the nominee is.
 - c. No physical items will be permitted, including but not limited to buttons, posters, giveaways, etc. This also includes posting such items on social media (e.g., Facebook, Instagram, X, Snapchat, etc.)
 - d. No candidate/nominee may raise funds to campaign.
 - e. Nominees shall not approach new families at/during a chapter meeting/event, during/at NPW, and/or on an individual level for the purpose of discussing their intent to run for the Chapter Board or any other elected office/position within the chapter.
- 2. Approved campaigning will include:
 - a. Introducing oneself as a nominee.
 - b. Attending various chapter events throughout the year with the ability of introducing yourself as a nominee, at the nominee's own expense. Nominees shall decline to make any remarks or speeches.
- 3. Failure to follow SOP 3.13D Campaigning, Sections 1 and 2 will result in the expulsion of the nominee from the election process.

3.14. CHAPTER 15% ANNUAL NET INCOME ASSESSMENT:

National C.O.P.S. requires its chapters to contribute to the national effort to support law enforcement survivors.

- A. Chapters will be required to make an annual contribution to the National organization of Concerns of Police Survivors, Inc., of at least fifteen percent (15%) of the chapter's annual net income for the fiscal year ending March 31.
- B. The chapter will forward at least 15% of their annual net income to the National Office by July 31 each year.
- C. A chapter that refuses to contribute at least 15% of their annual net income receipts will receive a certified mail reminder of their need to comply with this requirement.
- D. The chapter will have 30 days from receipt of that certified mail notice to comply.

3.15. DISBANDING PROCEDURE:

- A. A decrease in survivor participation may be a reason for chapters to cease to function according to National C.O.P.S. requirements. There may also be occasions when the National organization must step in to revoke a charter for a chapter's failure to meet National requirements. When disbanding of a C.O.P.S. chapter is necessary, proper chapter disbanding procedures must be followed.
- B. If a chapter has problems functioning because of lack of interest, the chapter should submit a letter to the National Chapter Liaison stating reasons for wanting to disband the chapter.

The letter must be signed by the remaining members/Chapter Board and notarized and sent.

- C. The National Board will review this request to disband, and, if the disbanding request is accepted, the National Chapter Liaison will contact the chapter in writing with further instructions on the final steps needed to disband.
- D. When a chapter is having its charter revoked by National for failure to meet specific requirements of a chapter, a certified letter notifying the chapter of the disbanding will be sent to the contact person of the chapter with copies sent to all Board members, the National C.O.P.S. Region Trustee, and the C.O.P.S. National Office.
- E. All debts must be paid by the chapter prior to officially disbanding, as stated in Article V of the Articles of Affiliation.
- F. Any and all Chapter Board members of a chapter that has been disbanded for cause, unless granted an exception by the National Board, cannot hold an elected or appointed position with any other C.O.P.S. chapter for a period of five years.
- G. Should the disbanded chapter reorganize under new leadership, the five-year restriction will begin at the first official meeting of the new chapter.
- H. All books, records, charter and funds belonging to the chapter shall be forwarded to the C.O.P.S. National Office along with a complete financial report.
- I. The chapter's funds will be held in escrow by the C.O.P.S. National Office for a period of one year from the date of disbandment. If the chapter is re-organized within a one-year period, the funds will be returned to the chapter. If after one year the chapter does not reorganize, the funds will be absorbed into C.O.P.S. National Office general account or may be distributed to the chapter(s) who officially takes over the geographic boundary.
- J. Any legal fees National C.O.P.S. may incur from the disbandment process will be deducted from any of the chapter's remaining assets.
- K. The National Chapter Liaison will notify C.O.P.S. National Office Legal Counsel when a chapter has disbanded so proper filing of dissolution with the appropriate state regulatory agencies can be completed. Legal Counsel will send copies of this report to the National Chapter Liaison for filing in the chapter's files. The NCL will assure the dissolution of the chapter is reported immediately to the IRS.
- L. The C.O.P.S. National Office will notify all survivors in the chapter's service area that their chapter has been disbanded.

3.16. DEFINITIONS:

A. Co-worker:

1. A *Co-worker* survivor is a co-worker of a fallen officer as determined by C.O.P.S. criteria. While a co-worker of a fallen officer is normally a sworn law enforcement officer, exception can be made if there was a law enforcement work-related connection between the fallen officer and the co-worker, e.g., dispatchers and

administrative personnel may also be included, depending on the circumstances. In order to be considered a *Co-worker* survivor, the co-worker must declare themselves as affected by the loss of the fallen officer and must have either:

- a. Worked at the same agency as the fallen officer; or
- b. Previously worked at the same agency with the fallen officer; or
- c. Worked in a neighboring agency or task force with the fallen officer and had regularly responded to calls for service with that fallen officer; or responded to the incident which resulted in the officer's death; or
- d. Attended a police academy with the fallen officer.
- 2. Individuals who wish to be considered a *Co-worker* of a fallen officer but their relationship with that officer falls outside of this definition, must apply with the National Office and be approved for inclusion by the Executive Director. If the co-worker does not agree with the decision of the Executive Director, he/she can appeal this decision with the C.O.P.S. National Board.

B. Significant Other:

- 1. A *Significant Other* survivor shall be defined as the Significant Other who has an "established romantic relationship" with the fallen officer.
- 2. "Established romantic relationship" refers to the relationship having been generally accepted as <u>committed</u> to friends, family and the general public. It will also be generally accepted that those who romantically shared a residence and/or shared combined financial responsibility would be considered a survivor in this category.
- 3. Individuals who wish to be considered a *Significant Other* of a fallen officer but their relationship with that officer falls outside of this definition, must apply with the National Office and be approved for inclusion by the Executive Director.
- 4. If the Significant Other does not agree with the decision of the Executive Director, he/she can appeal this decision with the C.O.P.S. National Board.

C. Fiancé/Fiancée:

- 1. A Fiancé/Fiancée survivor shall be defined as the Fiancé/Fiancée of the fallen officer.
- 2. Fiancé/Fiancée refers to a romantic relationship with the intent to marry. The term "intent to marry" means that a public or family announcement has been made to marry, a marriage date has been set, a ring has been exchanged, or the engagement can be verified by a credible third party such as the law enforcement agency.
- 3. Individuals who wish to be considered a *Fiancé/Fiancée* of a fallen officer but their relationship with that officer falls outside of this definition, must apply with the National Office and be approved for inclusion by the Executive Director.
- 4. If the Fiancé/Fiancée does not agree with the decision of the Executive Director, he/she can appeal this decision with the C.O.P.S. National Board.

D. Child:

1. A *Child* survivor of the fallen officer is required to meet one or more of the following criteria; in addition, supporting documentation may be required to support the claim, for example, a birth certificate, a marriage certificate, an adoption letter or record, an adoption decree, a custody order, etc.:

- a. The officer is the biological parent of the child.
- b. The officer married the child's biological parent making the officer the stepparent of the child.
- c. The child has been legally adopted by the officer.
- d. If there was no legal marriage or adoption, the child must have lived with his/her biological parent and the officer at least 50% of the time or as agreed upon in the judicial plan.
- e. The child has been approved and recognized as the child or stepchild of the officer by the Public Safety Officers' Benefits Program.
- 2. The parent(s) of a child who wish their child to be considered a *Child* of the fallen officer but their relationship with that officer falls outside of this definition, must apply with the National Office and be approved for inclusion by the Executive Director. If the survivor does not agree with the decision of the Executive Director, he/she can appeal this decision with the C.O.P.S. National Board.

3.17. REFERENCES:

The following National SOPs are additional resources for direction and will be followed for appropriate implementation:

- A. SOP 12.0 Solicitation by Individuals, C.O.P.S. Members, and Chapters for National Programs.
- B. SOP 13.0 Standard Operating Procedure for Programs.
- C. SOP 15.0 Records Management and Disposition of Files and Documents Document Retention, Storage, and Destruction (Short Title: Document Retention Policy (DRP)).
- D. SOP 21.0 How an SOP or a Bylaws Article is Adopted or Amended.

SOP 3.3.A.9.b (Control# 9024-01) approved January 18, 2020 at National Board Meeting.

SOP 3.16 (definitions) approved January 18, 2020 at National Board Meeting.

SOP 3.16.D approved January 31, 2021 at National Board Meeting.

SOP 3.11 approved May 5, 2021 by National Board.

SOP 3.0 amended July 25, 2024 at National Board Meeting.

SOP 3.2, 3.4, 3.6, 3.17 amended July 24, 2025 at National Board Meeting.

4.0. NOMINATIONS/ELECTIONS COMMITTEE

4.1. SCOPE:

This Standard Operating Procedure (SOP) establishes guidelines for serving on the Nominations/Elections Committee (N/EC).

4.2. OBJECTIVE:

To provide sufficient information to members of this committee on their duties and the nominations and elections process per SOP 6.0 vetting applicants against eligibility criteria while maintaining objectivity.

4.3. COMMITTEE:

- A. COMMITTEE CHAIR: The Immediate Past President (IPP) shall be the N/EC Chair. If the IPP is unable or unwilling to serve, the position shall be appointed by the National President (NP) to any Past National President (PNP) and approved by majority vote of the National Board in accordance with the Bylaws.
- B. COMMITTEE MEMBERS: The Nominations/Elections Committee (N/EC) shall be an odd number with a minimum of seven (7) members.
 - 1. Committee members shall be past national Board members, former and present Chapter Board members and at least one Past National President (PNP). To be eligible, they must meet the following guidelines:
 - a. Have no family member (including co-worker survivor) running for the National Board.
 - b. Have no family member (including co-worker survivor) currently employed by C.O.P.S.
 - c. Have served on a chapter board within the last five (5) years, or served previously on the National Board, or have a valid and approved reason for not serving on a chapter board within the last five (5) years (approved/disapproved by majority vote of the sitting National Board). Requirement for committee applicants to have served on a chapter board within the last five (5) years shall be waived if that applicant has no chapter in their specific area.
 - d. By December 1st, the Chair will draft a letter to be posted on the C.O.P.S.' website and other C.O.P.S. media as well as be sent out by the NCL to all chapter Board members requesting letters of intent to serve on the N/EC.
 - e. All persons interested in serving on the N/EC are asked to write a letter of intent stating their desire to serve on the committee. Letters should be forwarded to the N/EC Chair no later than February 1st.
 - f. If at any point, a selected N/EC member has a situation occur as in SOP 4.3, Nominations/ Elections Committee, Sections B1a or B1b, they will immediately resign from the N/EC and the position will be filled by another person who meets the criteria.
 - g. Once the Committee Chair has verified that those interested in serving on the N/EC have met the requirements to serve, the Chair shall forward the list to the

National President who will then bring the list to the Board for their approval no later than February 15th. The Board will make the final determination for the make-up of the committee each year based on the diversity of the letters of intent that were submitted ensuring that 1) survivor type and 2) regions are equally represented, as best as possible. The Chair may have input on the total number of committee members needed.

h. The N/EC members may not file an application to serve on the National Board. Should they choose to submit an application after being appointed, they must resign from the N/EC immediately. If needed to satisfy 4.3 B (above), any vacated position shall be filled by the Committee Chair with approval of the Board.

4.4. DUTIES:

A. COMMITTEE CHAIR:

- 1. Shall oversee the nomination process.
- 2. Shall review each application to determine (1) if the applicant meets all eligibility requirements as stipulated in SOP 6.0, Nominations and Elections, and (2) that the application does not contain inappropriate language (i.e., demeaning, insulting, accusations, etc.).
- 3. Shall present all pertinent findings from N/EC members that would affect the nominations/election process to the National President in an objective and timely manner. Any unresolved issues will be presented to the National Board.
- 4. Shall maintain an objective, neutral and professional demeanor during the nomination process.
- 5. Shall adhere to a strict confidentiality policy regarding all written applications, reports, interviews, discussions and shall be required to sign a *C.O.P.S. Confidentiality & Nominee Pledge Information Policy* form.
- 6. Shall follow the dates and deadlines set forth in SOP 6.0, Nominations and Elections.
- 7. Shall furnish the committee with all completed application packets.
- 8. Shall set up a conference/video call with committee members to discuss applicants and committee's recommendations no later than February 28th. This discussion shall remain specific to each applicant only.

B. COMMITTEE MEMBERS:

- 1. Shall maintain an objective, neutral and professional demeanor during the nomination process.
- 2. Shall adhere to a strict confidentiality policy regarding all information contained in all written applications, reports, interviews, discussions and shall be required to have signed a *C.O.P.S. Confidentiality & Nominee Pledge Information Policy* form be kept on file by the N/EC Chair.
- 3. Shall report issues that may arise with applicants to the N/EC Chairperson.
- 4. Shall make their recommendations on each applicant to the Chair.
- 5. Shall review each committee person's recommendations and reports.
- 6. Shall be available to discuss the Committee's recommendations via conference/video call.

All SOPS revised and adopted on November 17, 2013 SOP 4.5 and 6 amended on February 20, 2015 SOP 4.3 amended on January 21, 2016 (Pearl conference

SOP 4.3 amended on January 21, 2016 (Board conference call)

SOP 4.0 and 6.0 amended on January 25, 2016

SOP 4.0 and 6.0 amended on January 10, 2017

SOP 4.4 A 9 amended May 11, 2017

SOP 4.0 amended May 1, 2024

5.0. ELECTIONS AUDIT COMMITTEE

5.1. SCOPE:

A. This Standard Operating Procedure (SOP) establishes guidelines for serving on the Elections Audit Committee.

5.2. OBJECTIVE:

A. To provide sufficient information to members of this committee on their duties and the election process.

5.3. COMMITTEE:

- A. CHAIRPERSON: The chairperson of the Election Audit Committee (EAC) shall be the National Board Recording Secretary.
- B. COMMITTEE MEMBERS: The Elections Audit Committee shall consist of four (4) members, including the EAC Chairperson and Parliamentarian. One chapter representative from each of the two most recent chapters awarded "Chapter of the Year" will be selected to serve on the EAC. The selection of these two representatives shall be each chapter's choice. If either and/or both of these "Chapter of the Year" has a member running for the National Board, they will be skipped and the "Chapter of the Year" preceding them shall fill the position. There shall be no one on this committee running for the National Board. If the "Chapter of the Year" does not want to sit on the N/EC, the next "Chapter of the Year" shall be selected until the two representatives are filled.

5.4. DUTIES:

A. COMMITTEE CHAIRPERSON shall:

- 1. Oversee the process of collecting all chapter votes and National Board votes as stipulated in SOP 6.0.
- 2. Shall be responsible for overseeing the tallying of all the election votes. National Board votes shall be tallied simultaneously with all chapter votes.
- 3. Should a conflict with the votes arise, the EAC Chairman and EAC Committee members shall work with the Chairman of the Nominations/Elections Committee to resolve it in an objective, expedient and professional manner.
- 4. Maintain an objective, neutral and professional demeanor during the vote tallying process.
- 5. Adhere to a strict confidentiality policy regarding all votes as stated in the Confidentiality Form previously filed.

B. COMMITTEE MEMBERS shall:

- 1. Maintain an objective, neutral and professional demeanor during the process of tallying the election votes.
- 2. Adhere to a strict confidentiality policy regarding all votes and shall be required to sign a Confidentiality Form.

- 3. Be available for a virtual meeting between July 11th and July 13th to tally the election results.
- 4. Refrain from participating in any discussions regarding the nominees.
- 5. Work with EAC Chairperson and Parliamentarian in tallying the election votes.
- 6. Be released from the committee once the EAC Chairman has reported the results with all nominees, the National Board, and chapters.

SOP 5.0 amended May 1, 2024

6.0. NOMINATIONS AND ELECTIONS

6.1. SCOPE:

This Standard Operating Procedure (SOP) establishes guidelines for the process of nominating and electing officers to serve on the National Board of C.O.P.S.

6.2. OBJECTIVE:

To provide a process to nominate and elect National Board officers.

6.3. NOMINATIONS:

- A. Eligibility for Nomination: Survivors must meet the following eligibility requirements for nomination:
 - 1. Applicants must be a member as defined in National Bylaws, Article III Membership.
 - 2. Applicants must have observed the first anniversary of their officer's death and attended National Police Week (including C.O.P.S. National Police Survivors Conference).
 - 3. Applicants for office must meet all eligibility requirements. The following events are mandatory: must register and participate in upcoming NPW including attending and volunteering at the C.O.P.S. National Police Survivors Conference. Applicant should have attended at least one Weekend or Camp for which they are eligible.
 - 4. Applicants should have experience on a chapter board or have been a past National Board member. If an applicant does not have prior chapter or National Board experience, the applicant may ask for a waiver. They shall provide the Nominations/Election Committee (N/EC) Chair with information stating the reasons why they do not meet the criteria, and their reasoning for wanting a waiver. The sitting National Board can approve/disapprove the waiver with a majority vote. Requirement for applicants to have served on a chapter board shall be waived if that applicant has no chapter in their specific area.
 - 5. Applicants may only apply for one position.
 - 6. Applicants for Region Trustee must reside in their respective region for the entirety of their term. If the applicant moves outside of their region, they shall agree to withdraw the application to become a Region Trustee.
 - 7. All applicants must sign a *C.O.P.S. Confidentiality & Nominee Pledge Information Policy* formagreeing that they will be an advocate for and supporter of the Concerns of Police Survivors organization and dedicated to work in the best interest of the C.O.P.S. organization. By signing this pledge, the applicant also acknowledges the confidential nature of the mailing, donor and membership files and lists as well as the practices, procedures, and methodologies of C.O.P.S. and any C.O.P.S. Chapter and that said nominee will abide by *C.O.P.S. Confidentiality & Nominee Pledge Information Policy* form.
 - 8. Upon submission of the application, all applicants will be required to sign a waiver agreeing to a criminal history check to be administered by the Executive Director of National C.O.P.S. or their designee.
 - 9. If elected to the National Board the following events are mandatory and requires participation: (a) NPW including C.O.P.S. National Police Survivors Conference in May; (b) C.O.P.S. National Board/Chapter Training (in person or virtually); (c)

Regular National Board Meetings (currently in July and January); (d) Applicant's choice of eligible Weekends and Camps; (e) Any special Board Meeting called by the President; (f) National Team Building. In addition, although not mandatory, Board Members are encouraged to attend various law enforcement conferences throughout the year, particularly if they are held in their region. Two or more absences during a fiscal year shall result in automatic dismissal, whether as an applicant, nominee, or elected board member.

- 10. The N/EC may recommend disqualification of any applicant who has (1) previously been convicted of a felony level offense anytime in their adult life or a misdemeanor offense during the previous five years from the date of the election, (2) has been convicted of a misdemeanor more than five years from the date of the election if the conviction was for such that it could cause alarm or moral question of the C.O.P.S. organization.
- 11. The N/EC may recommend disqualification of any applicant who has a sustained grievance against them in the C.O.P.S. organization. The N/EC will use their best judgment to determine if the sustained grievance was such that it may interfere in the applicant's role on the National Board.
- 12. The applicant must not have engaged in any activities which would preclude C.O.P.S. from being able to secure a bond for the applicant by a licensed bonding/insurance company.
- 13. The N/EC may recommend disqualification of any applicant who has violated C.O.P.S. Code of Conduct or has been expelled from the organization or any C.O.P.S. Program. The Chair will check with the National office to verify that all applicants meet these criteria.

B. NOMINATION PROCESS:

- 1. All current sitting National Board members should provide the Chair of the N/EC a letter of intent regarding their next term no later than January 7th.
- 2. Applications will be available on the C.O.P.S. website beginning December 1st.
- 3. All persons seeking nomination for office shall submit a completed application for nomination to the Chair of the N/EC no later than February 20th. This includes both sitting board members and new applicants. Letters of reference and confidentiality statements shall be dated no earlier than 60 days prior to the application cutoff date. The application form can be found on the National C.O.P.S. website or requested from the National Immediate Past President.
- 4. Application packets shall include the application form, an executed C.O.P.S. Confidentiality & Nominee Pledge Information Policy Form, the three (3) letters of reference, a resume and a picture. The packet must be submitted in one (1) PDF document. Incomplete applications will not be processed.
- 5. Letters of reference required are the same for both sitting and non-sitting board members. Three (3) letters are to be submitted, one from each category, i.e., personal, professional and survivor (either individual or chapter). Letters of reference shall not be solicited from family members. A letter shall not be used for more than one category. Applicants shall not submit more than the three (3) required letters. The letters should reference the applicant's qualifications for the position, to include his/her experience as well as his/her character.
- 6. If the N/EC finds something that they believe is significant enough to disqualify someone from seeking office, and no grievance has been submitted, the committee can forward the issue to the Grievance Committee for expedited fact finding.

- 7. In the event the N/EC recommends disqualification of any applicant, they shall prepare a written statement to be presented to the National Board who will then vote on the disqualification of the applicant. The applicant will have the opportunity to refute or explain any information that may disqualify them for the election process.
- 8. Any applicant denied consideration by majority vote of the Board will be excluded from this year's election process and must wait until the next election cycle to reapply for the nomination to the National Board.
- 9. The N/EC Chair will notify each applicant of the committee's decision no later than March 1st. This may happen in a face-to-face meeting, by telephone, or email.
- 10. Once the N/EC Chair has notified each applicant, the N/EC Chair will submit the final list of approved applicants to the National Board including the National Chapter Liaison.
- 11. Approved applicants become nominees and the applications are then processed.
- 12. The National Chapter Liaison and N/EC Chair will determine the questions to be asked during the nominee interviews.
- 13. There will be two sets of questions, one for the National President and one for the Region Trustee.
- 14. Nominees for National President and Region Trustee will have videotaped interviews conducted by the N/EC Chair, or committee members as assigned, during the period of March 5-20th. Nominees must be available via video conference for their interview. Each applicant will be given, in advance, the same set of questions they will be asked. Each applicant will be given the same length of time to answer their questions. C.O.P.S. staff shall help with the technical aspect of the taping and producing.
- 15. The N/EC reserves the right to make no nomination for any given position should a suitable nominee not be found. Any position not filled will be appointed by the incoming National President at a reasonable time upon taking office as outlined in SOP 8.0, Appointments to the National Board of C.O.P.S.
- 16. On or before April 10th, the National Board Recording Secretary will submit to the National Board and Chapter Board members the following information on the nominees for Region Trustee and National President: (1) the respective Region Trustee and President nominees' videotaped interviews, (2) the respective Region Trustee and President nominees' redacted applications, and (3) instructions for the voting process. At such time the Communications Staff will communicate to all membership the nominees and the election information via social media and the C.O.P.S. website.

6.4. CAMPAIGNING:

- **A.** Nominees may campaign to introduce themselves and allow chapters and the general membership to get to know them provided they follow these guidelines:
 - 1. Nominees may not refer to their opponents in any way. Negativity and mud-slinging will not be tolerated.
 - 2. All campaigning must be centered around educating the chapters and general membership on who the nominee is.
 - 3. No physical items will be permitted, including but not limited to buttons, posters, giveaways, etc.
 - 4. No candidate/nominee may raise funds to campaign.

- 5. Nominees shall not approach new families at chapter events, during NPW and/or on an individual level for the purpose of discussing their intent to run for the National Board.
- **B.** Approved campaigning will include:
 - 1. Nominees for National President will provide a written statement, 250 words or less, in their application that will be used in the HOPE Magazine (the National newsletter).
 - 2. Introducing oneself as a nominee.
 - 3. Attending various events during NPW with the ability of introducing yourself as a nominee. Nominees shall decline to make any speeches.
 - 4. New nominees attend NPW at their own expense, sitting board members excluded.
- **C.** Failure to follow SOP 6.4, Campaigning, Sections A and B will result in the nominee being expelled from the election process.

6.5. ELECTIONS:

- A. The National Board shall cast votes for Region Trustees and National President. The National Board votes either in-person or by email, via designated election email address, at the discretion of the National President. All votes will be submitted by July 10th. All applications will be entered into the record where they shall become official. No nominations shall be accepted from the floor. If in-person meeting, a sealed ballot shall be used.
- B. For chapters, in lieu of a specially prepared ballot, the candidates will be listed/documented in Chapter Minutes prepared for the meeting at which the voting is being recorded/voted with the results of the voting by chapter members. There shall be no write-in nominees permitted. Each chapter will vote for the National President; however, the Trustee position nominee will be voted upon only by the chapters of the Region's respective Trustee.
- C. Each chapter will be afforded **one** vote for their Region Trustee and **one** vote for National President. Each National Board member will be afforded **one** vote for National President. The National Board will have **one collective vote** for the Region Trustee. That vote will be determined by the majority of each National Board members' votes for each Region Trustee. In the event of a tie, the National Board will take an additional vote to break the tie. If that vote results in a tie, the National President will break the tie.
- D. The Meeting Minutes at which voting is being conducted and/or recorded, shall be submitted by the Chapter President or his/her designated individual to the designated email address used for election purposes only no later than July 10th. As a minimum, all Chapter Officers and Chapter Board members shall be an addressee on the email that is submitted reporting the election results. At the discretion of the Chapter President, election results can also be forwarded to the chapter membership if desired.
- E. The designated election email address will be managed by the National Board Recording Secretary and the Parliamentarian. The results will not be tabulated until the voting deadline of July 10th has passed. The permanent record will be kept in the confidential, locked records maintained by the National Board Recording Secretary. A copy of the

Minutes will be made that has all National Election nominee names and references to voting results redacted. The redacted copy will be provided to the NCL for inclusion in the chapter records on the database.

- F. Immediately following the voting deadline of July 10th and no later than July 13th, the Elections Audit Committee will meet, whether in-person, or telephone, or video, or teleconference session, and tally the election results.
- G. In case of a tie vote, any contested race shall be re-balloted by the current National Board members. A majority of all voting National Board members shall break the tie. If that vote results in a tie, the National President will break the tie.
- H. The Election Audit Committee shall share the election results immediately with the National President and the N/EC Chair. The National President and the N/EC Chair shall meet individually in-person or via an audio/video conferencing meeting via telephone, video, or teleconference session with any nominees in which the position was contested and had more than one eligible nominee. Once those individuals have been notified of the results, the Election Audit Committee Chairperson shall share the results with all nominees, the National Board, and chapters as soon as the results have been verified.

All SOPS revised and adopted on November 17, 2013; SOP 6.4 amended on May 11, 2014

SOP 4,5 and 6 amended on February 20, 2015

SOP 4.0 and 6.0 amended on January 25, 2016

SOP 4.0 and 6.0 amended on January 10, 2017

SOP 6.3.A.6, 6.3.B.1, 6.3.B.7 & 6.3.B.8, 6.3.B.13 - Amended by National Board vote on November 19, 2018

SOP 6.3.A.6, 6.3.A.11 & 6.3.B.12 – Amended by National Board vote on January 18, 2020

SOP 6.3.B.18 & 6.5 – Amended by National Board vote on January 31, 2021

SOP 6.5 - Amended by National Board vote on April 21, 2021

SOP 6.3.A.6. Amended by National Board vote on December 13, 2022

SOP 6.3.A.4. Added by National Board vote on December 13, 2022 effective August 1, 2023

SOP 6.0 Revised in its entirety and approved by National Board vote on January 31, 2024

SOP 6.3.A. Amended by National Board vote on July 24, 2025

7.0. TRAINERS FOR NATIONAL C.O.P.S.

7.1. SCOPE:

This Standard Operating Procedure (SOP) establishes guidelines for training provided by National C.O.P.S.

7.2. OBJECTIVE:

To provide guidelines and direction for the application/selection process and the contracting/retention of C.O.P.S. Trainers.

7.3. TYPES OF TRAINING CONSULTANTS:

C.O.P.S. shall make it a goal to have at least five (5) Training Consultants or "trainers" of each type, fully vetted through C.O.P.S. and readily available to deploy for scheduled trainings or training requested by organizations or agencies.

- A. C.O.P.S. Survivor Trainer: This trainer will be a family member survivor, at least three (3) years out from their loss, who has been vetted through the application process in this SOP.
- B. Law Enforcement Trainer: This trainer will be either an active or retired law enforcement officer who has experience with the C.O.P.S. organization and has been vetted through the certification process in this SOP. Being a Co-worker Survivor is preferred but not necessarily required.
- C. Mental Health Trainer: This trainer will be certified as a Mental Health Provider with experience within the C.O.P.S. organization, working with law enforcement officers, and shall be vetted through the application process in this SOP.
- D. Subject Matter Expert Trainer: This trainer has a personal experience and/or training that makes him/her uniquely qualified to give up to a two (2) hour presentation at the request of C.O.P.S. These experts do not have to be vetted through this SOP to give this specific type of instruction. Examples of these type of trainers are, but is not limited to: injured officers who present during a Traumas in Law Enforcement Training, a family survivor who shares their own personal experience as teaching tool for a class, an expert in an area of wellness or trauma who may present at the C.O.P.S. National Conference, or a Chapter member who gives a short presentation in their local area.

7.4. C.O.P.S. TRAINING:

- A. Trainings to be performed: C.O.P.S. offers various types of training. These trainings include, but are not limited to:
 - 1. Three-day Traumas of Law Enforcement (TLE) training
 - 2. Staff, Board, and Chapter Training
 - 3. Law Enforcement Agency Development (2-8 hour)
 - 4. Conference training

B. C.O.P.S. shall contract paid or volunteer trainers from the eligible list of trainers presented by the Vetting Committee to conduct all training lasting two hours or more on behalf of C.O.P.S.

7.5. TRAINING COMMITTEE:

- A. The Training Committee should be comprised of family member survivors with teaching experience, co-worker survivors with teaching experience, C.O.P.S. training staff, and advisors from the law enforcement community.
- B. The role of the Training Committee shall be to:
 - 1. Develop, audit and update the Traumas of Law Enforcement curriculum.
 - 2. Design new training programs.
 - 3. Provide input into new training opportunities available to C.O.P.S.
 - 4. Provide suggestions to grow the outreach of C.O.P.S. training.
 - 5. Oversee the selection of the Vetting Committee.

C. Vetting Committee:

- 1. Will be a sub-committee of the Training Committee.
- 2. Will be selected by the Training Committee.
- 3. Will consist of two (2) family member survivors with teaching experience, two (2) law enforcement officers with teaching experience, and the Training Manager.
- 4. Will review all applications for Trainer and will compile a list of potential Trainers eligible to be contracted by the Executive Director to perform training on behalf of C.O.P.S.
- 5. May be asked to review potential issues with contracted trainers, such as poor evaluations or failure to follow C.O.P.S. curriculum, etc.
- 6. May provide coaching.
- 7. May remove Trainers from the eligible Trainer list.
- 8. Will meet as the Training Manager sees a need to add new Trainers and applications have been received.

7.6. PROCESS TO BECOME A C.O.P.S. TRAINER:

A. Qualities sought:

- 1. Shall be knowledgeable and experienced in subjects and responsibilities for which the training will be designed.
- 2. Shall be good networkers and resource developers.
- 3. Shall be willing to try new techniques and approaches.
- 4. Shall demonstrate excellent teaching skills.
- 5. Shall have excellent communications skills.
- 6. Shall work well with all persons; having a wide variety of living experiences, learning styles, and education.
- 7. Shall be respected throughout the law enforcement and survivor community.
- 8. Shall speak, read, and write the language(s) of instruction fluently and accurately.
- 9. Shall understand and be committed to the purpose and goals of the C.O.P.S. organization.

10. Shall understand the culture of, and participate in, the law enforcement family.

B. Application process:

- 1. The application process for new Trainers shall always remain open.
- 2. Trainer applicants shall submit a letter of interest to the Training Manager.
- 3. Trainer applicants shall submit a resume to include the following information: prior teaching experience, relevant training, personal experience in the subject matter taught by C.O.P.S., and teaching references.
- 4. Trainer applicants shall submit a 15 minutes video of them presenting a class in a law enforcement related topic. This presentation could either be to a live class or a staged presentation. The applicant can request this requirement be waived by the Vetting Committee if the applicant has already been observed by other committee members or staff.
- 5. Trainer applications will be reviewed by the Vetting Committee when the Training Manager sees the need to convene this committee.
- 6. The decision of the Vetting Committee of eligibility shall be conveyed to the applicant by the Training Manager.

C. Choosing and assigning Trainers:

1. Considerations to be made by the Vetting Committee and Executive Director when choosing and assigning Trainers:

Quality of application

- a. Teaching experience and relevant trainings
- b. Evaluations of prior students (if available)
- c. Recommendations of the Training Committee
- d. Input from the Training Manager
- e. Relevance of the trainer's personal experiences to the class
- f. Willingness and demonstrated ability to teach the curriculum as designed by the training committee
- g. Attendance at the Weekend or Camp for their survivor group, if applicable
- 2. The Vetting Committee and C.O.P.S. staff shall not use bias or discrimination in the vetting or hiring process.
- 3. The Vetting Committee shall verify there is no conflict with an applicant's current employer prior to adding the applicant to the eligibility list.
- 4. Final decision to contract Trainers for any particular C.O.P.S. training rests with the C.O.P.S. Executive Director.
- D. New Trainer requirements after being selected as a Trainer:
 - 1. Attend the entire three day Traumas of Law Enforcement Training, at least once.
 - 2. Teach a two hour block of C.O.P.S. instruction, at least once, with another Trainer present to assist, provide feedback, and approve the Trainer to solo teach going forward. A second block of instruction can be required if requested by the training observer.

- E. Requirements for all trainers to remain active as a C.O.P.S. trainer:
 - 1. Fulfill all obligations and provide quality instruction as contracted.
 - 2. Teach for C.O.P.S. at least one time per year, unless requirement waived by the Vetting Committee.
 - 3. Cooperate with inquires/coaching by the Vetting Committee on sub-par evaluations.
 - 4. Participate in designated conference calls and/or in person meetings to discuss the C.O.P.S. training program.

F. Trainer compensation:

- 1. Per this SOP, the C.O.P.S. Executive Director shall be authorized to hire Training Consultants (Trainers), who are eligible, for pay to complete instruction on behalf of C.O.P.S.
- 2. Per this SOP, the C.O.P.S. Executive Director shall be authorized to approve volunteers, who are eligible, to instruct on behalf of C.O.P.S.
- 3. All Trainers for C.O.P.S., paid or volunteer, shall be placed under contract to perform trainer services and will be considered a Training Consultant to C.O.P.S.
- 4. The compensation amount for these Trainers will be determined by the Executive Director, with the understanding that the compensation paid will remain within the annual budget of C.O.P.S. for consultant pay and training. Compensation will be consistent with consultant pay in common practice.

7.7. TRAIN THE TRAINERS:

- A. C.O.P.S. recognizes the need to find future trainers from within the C.O.P.S. organization and to provide development to its members to assist in promoting the chapters.
- B. C.O.P.S. will provide a *Train the Trainer* segment at Board/Chapter Training each year, as well as online training, to those interested in learning more about public speaking, creating lesson plans and other aspects of instruction, and submitting presentation proposals to outside organizations.

SOP 7.0 – Control # 9012-01- voted on by the National Board on February 4, 2019 SOP 7.6 – Amended at National Board Meeting on July 24/2025

8.0. APPOINTMENTS TO THE NATIONAL BOARD OF C.O.P.S.

8.1. SCOPE:

A. This Standard Operating Procedure (SOP) establishes guidelines for the National President in making appointments to the National Board when required to do so in the Bylaws.

8.2. OBJECTIVE:

A. To provide sufficient information to the National President on the process of making appointments when a vacancy exists to a position as the result of the inability or unwillingness of an officer or director to serve.

8.3. DUTIES: IN MAKING APPOINTMENTS, THE NATIONAL PRESIDENT:

- A. Shall consider all possible candidates for vacancies on the Board consistent and in accordance with the general standards for these positions as set forth in Article V and Article VI of the Bylaws.
- B. Shall develop a list of at least three (3) names of eligible survivors to fill the vacancy.
- C. Shall make an attempt to ensure that the list contains people who represent a variety of survivor types.
- D. Shall ensure that the list contains people who represent different chapters and states within the region where the vacancy exists, including residency within the region represented for Region Trustees.
- E. Shall require possible appointees to complete the same application the Nominations/Elections Committee used during the previous nomination process.
- F. Shall collect the completed application from all possible appointees.
- G. Shall conduct telephone interviews of possible appointees using the same questions the Nominations/Elections Committee used during the previous nomination process. If need be, additional questions may be asked that pertain to the position being filled.
- H. Shall add any questions they determine are pertinent to the appointment.
- I. Shall determine who is a viable candidate once all applications have been reviewed and interviews conducted.
- J. Shall forward the list of all viable candidates for appointment to the National Board for their opinion and feedback.
- K. Shall review all feedback from the National Board.
- L. Shall choose a candidate to be appointed based on all information gathered.
- M. Shall present the National Board with his/her choice of the best candidate to be appointed.

N.	Shall make the appointment v	ith the approval a	and majority vote	from the National Board.
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0.	If a suitable candidate cannot be found, the Trustee position may be left vacant until the
	next election, or until a suitable replacement becomes available.

9.0. <u>COMPLAINT POLICY</u>

9.1. SCOPE:

The National Board recognizes that complaints may arise against individual members, chapters, or National Board Members. Our organization embraces the values of the organization and requires all members to follow those values. The National Board encourages open communication as a first step in almost every disagreement. Both informal and formal mediation is also available, if approved, when communication breaks down. If a complaint is criminal in nature, if it surrounds legal protections against discrimination or harassment, or is deemed by the National President and/or the Executive Director to be very serious in nature, it can be addressed as a formal grievance. Complaints against national staff members should be expressed to the Executive Director and are handled outside the scope of this policy.

9.2. OBJECTIVE:

The purpose for this policy is to provide a process for the national organization to address concerns raised by members, to resolve their complaint(s).

9.3. CATEGORIES OF COMPLAINTS:

If a member of C.O.P.S. wishes to file a complaint, they should review this policy to determine if their concern falls within the scope of the policy, and if so, which category of the policy they believe was violated. All complaints must be identified as falling within the scope of one of the two categories listed below. Anonymous complaints are generally discouraged but may be accepted at the discretion of the Executive Director and/or National President.

A. Category One:

- 1. Interpersonal conflicts: conflicts arising between one or more members disrupting the business of the Chapter or National Board or believed to be in violation of the core values of C.O.P.S. but do not rise to the level of a potential criminal complaint or legal protections surrounding discrimination or harassment.
- 2. Issues of Performance or mismanagement of responsibilities: failure to perform the duties of the elected, appointed, or hired position; errors that have been made through mistake or carelessness, but without evil intent and/or violation of law; failure to honor commitments.
- 3. Unethical behavior: deliberate deception, bullying, or intentional disregard of organizational policy.
- 4. Violation of the conflict of interest policy, breaches of confidentiality or financial ethics responsibilities, or any member involving themselves with competing interests that are counterproductive to the interests of C.O.P.S.

B. Category Two:

- 1. Misappropriation of assets: violation of fiduciary duty or reasonable care of the assets of the organization and/or intentional illegal use of property or funds for unauthorized purpose.
- 2. Behavior in violation of legal protections surrounding discrimination or harassment.
- 3. Potential law violations occurring either within the scope of C.O.P.S. business or outside of C.O.P.S. business, but could bring discredit to the C.O.P.S. organization
- 4. Behavior that is very serious in nature where an independent investigation is needed in order for the National Board to reach a disposition.

9.4 CATEGORY ONE COMPLAINTS:

If the complaint falls into **Category One**, the following steps shall be taken:

- A. There shall be a meeting between the involved parties in an attempt for all involved to understand the issue from each perspective, to educate everyone involved on potential policies/core values being violated, with an honest attempt given to resolve the situation. It is preferred that an impartial third party attends this meeting.
- B. If the above meeting was not successful, the complainant may request intervention by the National Chapter Liaison. A meeting hosted by the National Chapter Liaison will occur to set clear expectations of each party going forward. Possible outcomes include:
 - 1. Both parties agree on the facts and the outcome, and the complaint is resolved.
 - 2. A change in behavior is promised to occur.
 - 3. Additional training will be given.
 - 4. The parties disagree with the facts surrounding the past but agree to a path forward in the best interest of C.O.P.S.
 - 5. The NCL was unable to resolve and the Chapter Board or NCL recommends formal mediation by an outside mediator or a resolution by the National Board by filling out a formal complaint form.
- C. If formal mediation or Board intervention is requested, the Executive Director and National President will decide whether the complaint rises to the level of needing a professional mediator or National Board intervention.
 - 1. If the Executive Director and National President elect to move forward with mediation, both sides of the disagreement will be encouraged to participate in this mediation. The mediation process will be handled according to SOP section 9.7.
 - 2. If the mediation is unsuccessful, the complainant can ask for a resolution by the National Board. The assessment of the professional mediator can be shared with the Board as well as any written documentation supplied by either the complainant or the accused.

- 3. The Executive Director or National President can also request Board intervention without mediation being offered.
- 4. Depending on the seriousness of the allegation, the National President may convene the Board to consider suspending a member of C.O.P.S. from participating in C.O.P.S. events until the Board is able to determine the outcome of the complaint.
- 5. If the Executive Director and National President do not feel the situation rises to the level of a professional mediator or National Board intervention, each party will be notified in writing and will be urged to try to move forward with one of the outcomes listed in 9.4 B. 1-4.
- D. The C.O.P.S. organization recognizes that not every concern or complaint will result in a resolution. One potential outcome is that parties agree to disagree as long as the values of C.O.P.S. can be followed.
- E. National Board Process for Category One Complaints:
 - 1. When asked to provide a disposition of allegations of Category One violations, the Board shall convene to review the documentation. It is permissible to wait for a regularly scheduled Board meeting or to schedule a special video conference meeting.
 - 2. If the complaint is very minor in nature the National President can also elect to have a written summary provided to the Board and an email vote to be taken rather than meet in person or via video conference.
 - 3. The Board will confidentially review any written documentation by the survivors involved, and, if applicable, the National Chapter Liaison, the professional mediator, the Executive Director or other parties with information pertaining to the complaint.
 - 4. The Board will determine if they go forward with considering the complaint or can elect not to consider the complaint.
 - 5. The Board can request additional information or can ask individuals to provide testimony to the Board in Executive Session prior to providing a disposition.
 - 6. The Board shall consider all facts to the best of their abilities. Recommended dispositions are one or more of the following if the complaint is found to have merit, based on the preponderance of the evidence:
 - a. Formal letter from the National Board requiring a behavior to cease and/or an apology given.
 - b. Formal request by the National Board for the involved parties to engage in mediation.
 - c. Suspension of a member from participating in chapter or national events
 - d. Removal of a member from the organization, if the behavior is found to be repeated, even after intervention, or is found to be very serious in nature
 - e. Requirement from the National Board that a policy, procedure or practice be changed
 - f. Requirement that the member participate in training to address the problematic actions or behavior
 - g. Other disposition of a complaint based on the needs of the member or overall best interests of the organization
- F. Failure of the member to follow through with the request or requirement of the National Board is grounds for the National Board to suspend or remove a member from C.O.P.S.

- G. If the National Board determines the complaint does not have merit or is found not be true, the Board shall instruct that a formal letter be written to notify all parties of the Board's decision.
- H. The Documentation of the Category One Complaint and the Board's dispositions shall be stored confidentially in the C.O.P.S. National Office.
- I. The National Board's decisions regarding the outcome of complaints are considered confidential and will only be shared on a need-to-know basis with staff and/or chapters.

9.5 CATEGORY TWO COMPLAINTS:

- A. If a formal complaint form is completed and received by the organization, the following **process** will be used:
 - 1. The complaint form shall be signed by the complainant and sent to the Executive Director, National President or Grievance Chair.
 - 2. The complaint form shall be reviewed by the Executive Director, National President and Grievance Committee Chair to ensure that the allegation is a Category Two complaint. If the allegation is determined not to be a Category Two complaint, it can either be reassigned as Category One, if applicable, or sent back to the complainant with an explanation that it does not fit the policy. This initial review shall take place within **ten (10)** business days of receipt of the complaint form.
 - 3. If the complaint is against the Executive Director, National President or Grievance Chair, the accused will recuse themselves from the investigation and the two not involved can make the determination if a formal investigation will proceed.
 - 4. The complaint will be assigned a complaint number as a tracking mechanism. These records will be filed by the letter, "C," then the calendar year the complaint was received, followed by a sequential number, e.g., C-2025-001.
 - 5. The complaint will then become a formal complaint and will be given to the Grievance Chair to begin the investigation as described in 9.5(B).
 - 6. When the formal complaint is given to the Grievance Committee for investigation, the accused and the complainant will be informed of the complaint, given a brief summary of the accusation and will be provided a copy of this SOP. The formal complaint form will not be shared outside of the Grievance Committee and the National Board.
 - 7. Depending on the seriousness of the allegation, the National President may convene the Board to consider suspending a member of C.O.P.S. from participating in C.O.P.S. events until the outcome of the grievance.
 - 8. The Grievance Committee is required to complete the investigation within 60 days of receiving the complaint. If the investigation cannot be completed in that time the Grievance Chair can request additional time in 30-day increments from the National President. The complainant and accused shall be notified by the Executive Director each time the additional time is granted.
 - 9. The National Board shall convene within 30 days of receiving a completed grievance investigation to review the investigation and decide an outcome.

- 10. The National Board shall meet in Executive Session to review the complaint. The National Board may request additional investigation from the Grievance Committee or make a decision.
- 11. The National Board's decision shall be considered final, unless an appeal is filed containing new information that has not been previously considered within the time frame and procedures in section 9.7.
- 12. The complainant and the accused will be notified of the National Board's decision by the Executive Director within ten (10) business days of the Board meeting via a formal letter with a signature receipt requested.
- 13. The notification shall include information about the process to appeal.
- 14. The National Board's decisions regarding the outcome of complaints are considered confidential and will only be shared on a need-to-know basis with staff and/or chapters.
- B. Investigation of Category Two complaints by the Grievance Committee:
 - 1. The Chair will review the complaint and may reach out to the complainant for clarifying information.
 - 2. The Chair will review the category of complaint and determine the limited scope of the investigation.
 - 3. The Chair may meet with their entire committee or a sub-set of the committee.
 - 4. The Chair may check with the Executive Director to determine whether there has been previous action taken by C.O.P.S. concerning the situation described in the complaint.
 - 5. The Chair and the Committee may consult Legal Counsel during any part of the process.
 - 6. If the complaint is determined to be of a criminal nature, the Chair shall consult with the National President and Executive Director to determine if the investigation should be suspended until the law enforcement investigation is complete. Suspending the investigation to wait for the criminal investigation shall stop the time requirement in this SOP until the investigation can proceed.
 - 7. If the complaint is also being investigated by outside law enforcement, once the investigation is complete, the complaint process will start to move forward again.
 - 8. The Chair shall assign investigative tasks to Committee members as he/she feels appropriate. It is recommended as best practice to limit the number of interviewers to the fewest number possible to ensure that information received in one interview can be used as directed questions in other interviews.
 - 9. The investigator shall limit the scope of the investigation to the allegations in the formal complaint. If during the course of the investigation, new violations are identified, the Chair may proceed and consider the additional investigation but shall notify the National President and Executive Director of the increased scope of the investigation.
 - 10. Interviews shall be summarized into a written statement as close to the actual interview as possible, to limit human error.
 - 11. After completion of the investigation, the Chair shall convene the Grievance Committee to review the investigation and determine the finding of the allegations as described in 9.4.
 - 12. All investigative documents shall be shared with the National Board prior to the National Board meeting that will be held to determine disposition of the complaint.

- These materials are to be treated as confidential and shall not be shared outside of Executive Session of the Board.
- 13. The Grievance Committee may also submit a recommendation of disposition for the complaint, with the final decision resting with the National Board.

C. Disposition of Category Two complaints:

When asked to provide a disposition of allegations When asked to provide a disposition of allegations of Category Two violations, the National Board shall convene within 30 days to review the Grievance Committee's investigation and to provide a disposition. This meeting will be held either in person or via a special video conference meeting. The following procedures will be followed:

- 1. The National Board will be provided a confidential link to the information prior to the National Board Meeting. The National President shall ensure that the Board is given adequate time to review documents prior to the meeting.
- 2. The Board can ask the Grievance Chair to attend this meeting or any other experts who may be needed to answer questions regarding the investigation.
- 3. All investigations will be discussed confidentially in Executive Session.
- 4. The Board will determine if they agree with the findings of the Grievance Committee. If the Board does not agree or if they need additional information, the Chair can be tasked with getting additional information on behalf of the Board.
- 5. Recommended dispositions are one or more of the following if the complaint is found to be **Sustained**:
 - a. Formal letter from the National Board requiring a behavior to cease and/or an apology given
 - b. Suspension of a member from participating in chapter or national events
 - c. Removal of a member from the organization, if the behavior is found to be repeated even after intervention or is found to be very serious in nature
 - d. Requirement from the National Board that a policy, procedure or practice be changed
 - e. Other disposition of a complaint based on the needs of the member or the overall best interests of the organization
- 6. Recommended dispositions if the complaint is found to be **true but is considered a policy failure:**
 - a. Requirement from the National Board that a policy, procedure or practice be changed
 - b. Requirement that the member participate in training to address the problematic actions or behavior
 - c. Other disposition of a complaint based on the needs of the member or overall best interests of the organization
- 7. Recommended dispositions if the complaint is found to be **Not Sustained**, **Unfounded or Exonerated:**
 - a. A formal letter is sent to all parties explaining the finding of the investigation.
 - b. The Board may request a formal discussion between the parties of the accused/complainant in an attempt to prevent further issues.

9.6 BURDEN OF PROOF AND FINDINGS:

- A. "Preponderance of the Evidence" is the burden of proof that will be used in determining the finding of any complaint investigation. Preponderance of the Evidence is defined as the evidence presented leads to the conclusion that the fact in question is more likely to be true than not.
- B. In complaints that reach to the level of the National Board for determination, the Board will reach one of the following findings for each allegation:
 - 1. The allegation is sustained. The investigation discloses that the alleged act occurred and it constituted misconduct.
 - 2. The allegation is not sustained. The investigation discloses that there is insufficient evidence to sustain the complaint or fully exonerate the accused.
 - 3. The accused is exonerated. The investigation discloses that the alleged act occurred, but that the act was justified, lawful and/or proper.
 - 4. The allegation is unfounded. The investigation discloses that the alleged act did not in fact occur.
 - 5. The allegation is true but is considered a policy failure. The investigation discloses that the established C.O.P.S. SOPs did not operate as intended. For example, an existing policy within C.O.P.S. needs to be reviewed for potential changes based on information learned during the investigation of the complaint.

9.7 APPEAL:

- A. If either the complainant or the subject of the investigation is dissatisfied with a decision made by the National Board, an appeal may be filed with the Board within twenty (20) business days of the notification. The appeal shall be sent to the National President or the Executive Director.
- B. The request for appeal must include new or additional information the National Board may not have received as part of the investigation.
- C. The National Board will review and determine if the information provided in the request for appeal warrants additional consideration or investigation.
- D. The National Board may refuse an appeal if they feel there is not an adequate cause.
- E. If the National Board feels there is adequate cause for further review, they will offer to listen to the complainant in Executive Session at the next Board meeting or via electronic conference call or to review written documentation provided by the appellant.
- F. The National Board's decision following this appeal shall be final.
- G. The Executive Director will notify the complainant of the National Board's decision within ten (10) business days of the decision.

9.8 MEDIATION:

The Purpose of Mediation: Mediation is an informal and flexible dispute resolution process.

A. The Mediator: Mediation is conducted by a professional mediator hired by C.O.P.S. who will attempt to secure an agreement between the parties involved in a conflict.

B. The Mediator:

- 1. Has completed specialized training in mediation;
- 2. Acts as a catalyst between opposing interests attempting to bring them together;
- 3. Helps define the issues and eliminate obstacles to communication;
- 4. Seeks concessions from each side:
- 5. Keeps the process focused and moving forward to resolution;
- 6. Does not assess blame nor render an opinion.

C. The Process of Mediation:

- 1. If requested by the Executive Director or the National Board, a mediator will be assigned to conduct the mediation process.
- 2. The Executive Director or his/her designee will contact all parties to set up the mediation.
- 3. If more than one session is needed, the mediator shall confer with the Executive Director to discuss. If the Executive Director and the mediator do not agree on whether additional meeting should be offered, the decision will lie with the National Board.
- 4. If the mediation is the result of a Board decision, the cost of the mediation will be paid by National C.O.P.S., unless otherwise directed by the National Board.
- 5. The mediator will work to finalize an agreement and determine the steps necessary for implementation.
- 6. Once settlement/agreement is achieved, the mediator will record it for signature immediately within three (3) business days to prevent second thoughts from destroying a good agreement. Mediator should provide results of mediation within ten (10) business days to Executive Director and National President.
- 7. Mediation records will be saved in a confidential location in the National Office.
- 8. If a Chapter Board requests mediation without involving the National Board, the mediation can be arranged by the Executive Director, but the cost will be the responsibility of the chapter.

9.9 WHISTLE BLOWER PROTECTION:

Any member/employee witnessing illegal, unethical, or conduct they perceive to be a breach of the fiduciary duty of this organization to its supporters, may report same without fear of retaliation or retribution. If one witnesses such conduct taking place in another area, then that person should report the incident to the respective Region Trustee, then they should report the incident to the C.O.P.S. National President. If the conduct witnessed involves the C.O.P.S. National President, then it should be reported to the Chair of the National C.O.P.S. Grievance Committee or its Legal Counsel. Keep in mind, the standard of witnessing behavior that is illegal, unethical, or in breach of fiduciary duty is very high.

9.10 COMPOSITION OF THE GRIEVANCE COMMITTEE:

A. The Chairman of the Grievance Committee and Committee members serve one-year terms and are selected by the National President at the first opportunity following national elections and subsequently confirmed by the National Board.

- B. The Grievance Committee is designed as a fact-finding committee and is considered an investigative tool of the National Board. The Grievance Committee is limited to investigating alleged Category Two violations as referenced in of SOP 9.3, unless specifically directed by the National Board to investigate a matter of a serious nature as determined by the National Board.
- C. It is recommended that the committee include members with investigative experience in interviewing witnesses and writing written reports. The committee should also contain member(s) with experience in reviewing financial documents.
- D. It is recommended that Grievance Committee members are familiar with the C.O.P.S. organization, but are not in a position of leadership within C.O.P.S.
- E. It is permissible to assign a staff person to a portion of the investigation if that staff person brings a skill needed for the investigation (for example, an accountant helping with financial investigations). This staff person will be prohibited from talking about the investigation with anyone besides the Grievance Chair and the Executive Director.

Approved SOP 9.0 adopted July 13, 2017 by the National Board Revised SOP 9.0 adopted January 31, 2021 by the National Board SOP 9.0 Revised in its entirety and approved by National Board vote on January 18, 2024 SOP 9.0 Revised in its entirety and approved by National Board vote on January 25, 2025

10.0 CONFLICT OF INTEREST POLICY

10.1 SCOPE:

This Standard Operating Procedure (SOP) is designed to foster public confidence in the integrity of Concerns of Police Survivors (the "Organization") and to protect the Organization's interest when it is contemplating entering a transaction (defined below) that might benefit the private interest of a National Board member or a National staff employee (defined below).

10.2 OBJECTIVE:

To provide a clear definition of conflict of interest and a course of action to follow in the event a conflict arises.

10.3 DEFINITIONS:

The following are considered insiders for the purposes of this policy:

- A. Each member of the National Board.
- B. Any key employee, meaning an employee who (a) has responsibilities or influence over the organization similar to that of directors or trustees; or (b) manages a program that represents 10% or more of the activities, assets, income, or expenses of the organization; or (c) has or shares authority to control 10% or more of the organization's capital expenditures, operating budget, or compensation for employees.
- C. Interest means any commitment, investment, relationship, obligation, or involvement, financial or otherwise, direct or indirect, that may influence a person's judgment, including receipt of compensation from the Organization, a sale, loan, or exchange transaction with the Organization.
- D. A conflict of interest is present when, in the judgment of the National Board and/or Grievance committee, an insider's stake in the transaction is such that it reduces the likelihood that an insider's influence can be exercised impartially in the best interests of the Organization.
- E. Transaction means any transaction, agreement, or arrangement between an insider and the Organization, or between the Organization and any third party where an insider has an interest in the transaction or any party to it.

10.4 PROCEDURES:

- F. *Duty to Disclose:* Each insider shall disclose to the National Board all material facts regarding his or her interest in the transaction, promptly upon learning of the proposed transaction.
- G. Determining Whether a Conflict of Interest Exists: With regard to an insider, the National Board and/or Grievance Committee shall determine if a conflict of interest exists. The

insider(s) and any other interested person(s) involved with the transaction shall not be present during the National Board's and/or Grievance Committee discussion or determination of whether a conflict of interest exists, except as provided in Section 10.5 below.

- H. *Process for Addressing a Conflict of Interest:* The National Board and/or Grievance Committee, after determining a conflict of interest possibly exists, shall adhere to the following:
 - 1. An interested person may make a presentation at the National Board and/or Grievance Committee meeting, but after the presentation, they shall leave the meeting during the discussion of, and the vote on, the transaction or arrangement involving the possible conflict of interest.
 - 2. The National President and/or Grievance Committee chair shall, if appropriate, appoint a committee to investigate alternatives to the proposed transaction or arrangement.
 - 3. After exercising due diligence, the National Board and/or Grievance Committee shall determine whether the Organization can obtain with reasonable efforts a more advantageous transaction or arrangement from a person or entity that would not give rise to a conflict of interest.
 - 4. If a more advantageous transaction or arrangement is not reasonably possible under circumstances not producing a conflict of interest, and a special committee had been appointed to investigate alternatives, that committee shall offer those proposed alternatives to the National Board and/or Grievance Committee. The National Board and/or Grievance Committee shall determine by a majority vote whether the transaction or arrangement is in the Organization's best interest, for its own benefit, and whether it is fair and reasonable. In conformity with the above determination, it shall make its decision as to whether to enter into the transaction or arrangement.

10.5. REVIEW BY THE BOARD:

- A. The National Board and/or Grievance Committee may ask questions of and receive presentation(s) from the insider(s) and any other interested person(s), but shall deliberate and vote on the transaction in their absence. The National Board and/or Grievance Committee shall ascertain that all material facts regarding the transaction and the insider's conflict of interest have been disclosed to the National Board and/or Grievance Committee and shall compile appropriate data to determine if a conflict of interest exists.
- B. After exercising due diligence, which may include investigating alternatives that present no conflict, the National Board and/or Grievance Committee shall determine whether the transaction is in the Organization's best interest, for its own benefit, and whether it is fair and reasonable to the Organization. A simple majority vote of the eligible National Board voting members and/or the Grievance Committee will make the determination if a conflict exists. It will be up to the National Board voting members and/or Grievance Committee to make recommendations on how to proceed with said conflict of interest, with what will be in the best interest of the Organization. The perceived conflict may be referred to the Organization's Legal Counsel for consideration and review.

10.6. RECORDS OF PROCEEDINGS:

The minutes of any meeting of the Board pursuant to this policy shall contain the name of each insider who disclosed or was otherwise determined to have an interest in a transaction; the nature of the interest and whether it was determined to constitute a conflict of interest; any alternative transactions considered; the members of the National Board and/or Grievance Committee members who were present during the deliberations on the transaction, those who voted on it, and to what extent interested persons were excluded from the deliberations; any comparability data or other information obtained and relied upon by the Board and how the information was obtained; and the result of the vote, including, if applicable, the terms of the transaction that was approved and the date it was approved.

10.7. ANNUAL DISCLOSURE AND COMPLIANCE STATEMENTS:

Each National Board member, including non-voting members and all key employees of the Organization, shall annually sign a statement on the form attached, that:

- 1. Affirms that the person has received a copy of this conflict of interest policy, has read and understood the policy, and has agreed to comply with the policy.
- 2. Discloses the person's financial interests and family relationships that could give rise to conflicts of interest.
- 3. Each National Board member shall sign the policy at the beginning of each term they are elected. The C.O.P.S. staff shall sign the policy during their annual review and it will become part of their personnel file.

10.8. VIOLATIONS:

If the Board has reasonable cause to believe that an insider of the Organization has failed to disclose actual or possible conflicts of interest, including those arising from a transaction with a related interested person, it shall inform such insider of the basis for this belief and afford the insider an opportunity to explain the alleged failure to disclose. If, after hearing the insider's response and making further investigation as warranted by the circumstances, the National Board and/or Grievance Committee determine that the insider has failed to disclose an actual or possible conflict of interest, the National Board and/or Grievance Committee shall take appropriate disciplinary and corrective action.

10.9. ANNUAL REVIEWS:

To ensure that the Organization operates in a manner consistent with its status as an organization exempt from federal income tax, the National Board shall authorize and oversee an annual review of the administration of this conflict of interest policy. The review may be written or oral. The review shall consider the level of compliance with the policy, the continuing suitability of the policy, and whether the policy should be modified and improved. The annual review of this policy will be handled by the Bylaws and SOP Committee.

11.0. SOCIAL MEDIA POLICY

11.1. SCOPE:

This Standard Operating Procedure (SOP) establishes guidelines and direction for the establishment and use of social media.

11.2. OBJECTIVE:

To provide guidelines and direction that shall be used for all National and chapter social media sites.

11.3. SOCIAL MEDIA POLICY:

Social media is an exceptional way of keeping in touch with our survivors and promoting events. It is important; however, to maintain discretion as the rules and social protocols are defined for this forum.

A. National Social Media Accounts:

1. Facebook:

- a. The National C.O.P.S. Facebook page will be set up as a public Organizational page. This allows for anyone to like and follow posts.
- b. The National C.O.P.S. Facebook page will have a minimum of two administrators who shall be staff from the Communications Department.
- c. C.O.P.S. content pertaining to National Police Week, conferences, trainings, Weekends and Camps should be shared on the National Facebook page. Promotion of chapter events and major donor promotions will be approved at the discretion of the C.O.P.S. Communications Director or a staff member in the Communications Department.
- d. The profile image shall be the trademarked National C.O.P.S. logo.
- e. Because this page is a public page, and inflammatory content is sometimes added by those commenting on posts, this page shall be closely monitored by the Communications staff and offensive content removed as soon as practical.

2. Instagram Account:

- a. National C.O.P.S. account is to be set to private to allow for administrative approval of followers.
- b. The Communications Director, or the Multimedia Specialist, or a staff member of the Communications Department will be designated as administrators.
- c. Profile image shall be the trademarked National C.O.P.S. logo.

3. LinkedIn Account:

- a. LinkedIn should be used for organizational awareness, professional networking, and donor/supporter recruitment.
- b. A Communications staff member will be designated as the administrator.
- c. Profile image shall be the trademarked National C.O.P.S. logo.

4. Twitter Account:

- a. Twitter should be used for concise messaging to a wide range of followers by using 140 characters or less.
- b. The administrator will be designated as a Communications staff member.
- c. Profile image shall be the trademarked National C.O.P.S. logo.

B. Chapter Social Media Accounts:

Facebook Pages:

- a. Chapter page accounts can be set as a Closed Group or a Public Page. It is each chapter's decision to determine which type is best for their respective chapter.
 - (1) A closed group gives the ability to set administrators and allow member-only comments, status updates, and pictures approved to be posted online. This page type is visible when searching and members can be invited to ask to join.
 - (a) Closed groups are preferred for chapter meeting information.
 - (b) Closed groups are for chapter member-only events.
 - (c) Closed groups are for private discussions between chapter members.
 - (2) A public page is open for the general public to view. All posts can be seen.
 - (a) Public pages are preferred for donor visibility.
 - (b) Public pages are designed to allow the public to see chapter events.
- b. Official chapter pages shall have a minimum of two administrators to assist with posting and monitoring.
- c. Chapters shall submit login/admin information to the Communications
 Department at the National Office at media@nationalcops.org to be kept on record in case issues arise.
- d. If a member of the National C.O.P.S. Communications Department is added as an administrator, they will not post anything without the permission of the chapter.
- e. Chapter events such as fundraising events, board meetings, etc., should be shared on the chapter page. As a closed group page, these details will not be visible to non-members unless posted with a "public" privacy setting.
- f. The profile image shall be the approved chapter logo.
- g. Chapters shall not set up their official pages or conduct chapter business in a secret page format.

2. Instagram Account:

- a. Chapters shall submit login/admin information to the Communications Department at the National Office at media@nationalcops.org to be kept on record in case issues arise.
- b. Set account to private to allow for administrative approval of followers.
- c. The profile image shall be the approved chapter logo.
- d. Chapters are encouraged to post videos and images that promote organizational awareness and advance chapter goals.

3. LinkedIn Account:

- a. Chapters shall submit login/admin information to the Communications
 Department at the National Office at media@nationalcops.org to be kept on record in case issues arise.
- b. LinkedIn should be used for organizational awareness, professional networking, and donor/supporter recruitment.
- c. The profile image shall be the approved chapter logo.

4. Twitter Account:

- a. Chapters shall submit login/admin information to the Communications
 Department at the National Office at media@nationalcops.org to be kept on record in case issues arise.
- b. Twitter should be used for concise messaging to a wide range of followers by using 140 characters or less.
- c. Profile image shall be the approved chapter logo.

C. Region Social Media Accounts:

- 1. Facebook and Other Social Media Pages:
 - a. Region page accounts can be set as a Closed Group or a Public Page. It is the decision of the Region Trustee to determine which type is best for his/her respective region.
 - (1) A closed group gives the ability to set administrators and allow member-only comments, status updates, and pictures approved to be posted online. This page type is visible when searching and members can be invited or ask to join.
 - (a) Closed groups are preferred for private region and chapter meeting information.
 - (b) Closed groups are for private discussions between chapter members and their Region Trustee.
 - (2) A public page is open for the general public to view. All posts can be seen.
 - (a) Public pages are preferred for donor visibility.
 - (b) Public pages are designed to allow the public to see Region events.
 - b. Official Region pages shall have a minimum of two administrators to assist with posting and monitoring.
- 2. Login/admin information shall be submitted to the National Office at media@nationalcops.org to be kept on record in case issues arise.
- 3. If a member of the National C.O.P.S. Communications Department is added as an administrator, they will not post anything without the permission of the Region Trustee.
- 4. Region events such as fundraising events, board meetings, etc. should be shared on the Region page. As a closed group page, these details will not be visible to non-members unless posted with a "public" privacy setting.
- 5. The profile image shall be the trademarked National logo.

6. Region Trustees shall not set up their official pages or conduct chapter business in a secret page format.

D. Social Media Content:

- 1. Elements of a good post:
 - a. Aligns with the C.O.P.S. mission
 - b. Timely
 - c. Attention-grabbing
 - d. Fits demographics and geographic location

2. Images:

- a. Name tags should be covered or blurred if possible. Chapters shall get permission to post from individuals if capabilities to blur name tags are not available.
- b. Photos taken in a public place where there is no reasonable expectation of privacy can be posted without permission.
- c. Attendees upon filing registration for all C.O.P.S. National events grant C.O.P.S. permission to use photos of all participants.
 - (1) Permission for photo usage of children under 18 must be given by parent/guardian.
 - (2) Photos taken at the Co-Workers Weekend and the Co-Workers for Couples are confidential and may not be used without the permission of the individual.
- d. All images posted on social media must be in good taste and reflect positively on both the individual and C.O.P.S.
- 3. Line of Duty Deaths (LODD) announcement: When a LODD or other traumatic event occurs, neither National C.O.P.S. nor any chapter shall post about the event until the event is made public by the agency.
- 4. Politics: Neither National C.O.P.S. nor chapters shall post political views on their social media pages.
- 5. Profanity: Filter settings should be set at the highest setting to prevent offensive language from being posted in comments on chapter pages.
- 6. Fundraising: C.O.P.S. reserves the right to refuse the post, share or promote a special event or fundraiser if it does not support the C.O.P.S. mission or a portion of the proceeds does not benefit National C.O.P.S. or a C.O.P.S. chapter.

Approved by the National Board May 11, 2020 SOP 11.3 Amended by the National Board July 24, 2025

12.0. <u>SOLICITATION BY INDIVIDUALS, C.O.P.S. MEMBERS, AND CHAPTERS FOR NATIONAL PROGRAMS (WEEKENDS AND CAMPS)</u>

12.1. SCOPE AND OBJECTIVE:

A. This Standard Operating Procedure establishes clear restrictions on individuals, C.O.P.S. members, and/or chapters regarding solicitation of additional funding for projects associated with National C.O.P.S. Programs.

12.2. FUNDING:

A. Funding for all National Programs and projects shall be funded by National C.O.P.S.

12.3. REQUESTS FOR ASSISTANCE:

- A. All requests for funding for projects held during National C.O.P.S. Programs should be sent to the National Office for consideration.
- B. Individuals, C.O.P.S. members and/or chapters shall not be solicited for additional funding by sources other than National C.O.P.S. for projects held during National Programs.

12.4. PROCEDURE IF ASKED FOR ASSISTANCE:

- A. National C.O.P.S. shall be notified immediately of any solicitation attempts.
- B. The soliciting individual/member/chapter shall be advised of procedure to request assistance and directed to contact National C.O.P.S.
- C. Any and all funds collected shall be turned over to the National Office immediately.
- D. Should the individual, C.O.P.S. member, and/or chapter continue to solicit funds, the National Office shall take the appropriate action, including but not limited to issuing a cease and desist.

All SOPS 1-12 revised and adopted on November 17, 2013 Amended July 24, 2025

13.0. PROGRAMS

13.1. SCOPE:

This Standard Operating Procedure (SOP) defines the rules to be adhered to regarding:

- A. Eligibility for all participants when attending any Concerns of Police Survivors (C.O.P.S.) Programs (Weekends and Camps);
- B. Registration/Cancellation/Travel Assistance.

13.2. OBJECTIVE:

To provide clear and concise information to participants, staff, and chapter boards regarding the items outlined in the scope above.

13.3. CRITERIA:

A. C.O.P.S. determines someone as a survivor by following a specific criterion which is as follows:

"C.O.P.S. membership is limited to surviving family members (spouse, child {natural, adopted, and step}, parent, and sibling), 'significant others', fiancés, other family members and affected co-workers of law enforcement officers who have died in the line of duty as determined by the Federal Bureau of Investigation (FBI), Bureau of Justice Assistance's Public Safety Officers' Benefit (PSOB), National Law Enforcement Officers Memorial Fund (NLEOMF) or Fraternal Order of Police (FOP) criteria."

- B. Persons referred to as "surviving" or "survivors" meet the above criteria.
- C. Anyone being referred to as a "domestic partner" is defined as a long term committed legal or interpersonal relationship between two individuals who live together and share a common domestic life, i.e., not just a boy/girlfriend.

13.4. ELIGIBILITY:

- A. C.O.P.S. is a non-discriminatory organization and has the mission of helping survivors, regardless of age, race, religious association, disability, or sexual orientation. With regards to the American Disabilities Act, C.O.P.S. further defines the following disability guidelines:
 - 1. C.O.P.S. is a non-discriminatory organization, we are also not trained medical/health professionals. C.O.P.S. reserves the right to require any participant to bring a medical aide to assist the participant in health care while at the program.
 - 2. If the participant is unable to employ a medical health aide to attend the program with them, the participant may bring a family member to assist.
 - 3. The medical aide or family member attending the program with the participant must submit to a background check before attendance at the program will be approved.

- 4. National C.O.P.S. may be able to provide travel assistance to the medical aide or family member for the participant for one (1) program annually. The availability of travel assistance funds is not guaranteed.
- 5. If the participant refuses to bring a medical aide or family member as outlined above, C.O.P.S. reserves the right to deny attendance to the program.
- 6. A medical aide or family member who is not qualified to be a participant of the survivorship program will be permitted to assist the disabled person into the session room but then must wait outside of the session room during the session.
- B. C.O.P.S. also recognizes that survivors receive the best help from peers who are experiencing the same survivor issues. A survivor will not be eligible to attend a program unless the program is specific to their survivorship. With peer support in mind, C.O.P.S. has adopted the following guidelines for participation in the program:

1. C.O.P.S. Kids Camp:

- a. C.O.P.S. Kids Camp is planned for surviving school-aged children, ages 6-14, of the officer as defined in SOP 3.0, paragraph 3.16 and their parent/legal guardian.
 - (1) To attend camp, the child must have turned 6 by the last day of Kids Camp and not be over the age of 14 when camp starts.
 - (2) The C.O.P.S. office receives many requests for exceptions to the age requirement rule; however, no exceptions can be made as there is a need to be consistent with all participants.
- b. Children at C.O.P.S. Kids Camp must be accompanied by a parent or legal guardian.
 - (1) If the parent or legal guardian is not able to attend, they can temporarily assign guardianship to another parent attending camp or to a responsible party over the age of 21. There is a "consent to chaperone" form to be signed by the parent or legal guardian turning over responsibility of their child(ren) to another adult. C.O.P.S. reserves the right to ask the designated guardian to submit to a background check if the designated guardian is unknown to C.O.P.S.
 - (2) Due to space limitations, only one parent/guardian is allowed to attend with the child(ren). The only exceptions made to this will be when the physical requirements of keeping up with the child(ren) are too much for one adult. In those cases, approved on an individual basis, a second guardian would be allowed to attend.
- c. Surviving children whose officer died by suicide are eligible to attend Kids Camp if the officer's suicide occurred on OR after January 1, 2019 and a PSOB claim is in the process of being filed or has been filed.

2. C.O.P.S. Young Adults Camp:

- a. C.O.P.S. Young Adults Camp is planned for surviving children as defined in SOP 3.0, paragraph 3.16 and surviving siblings, ages 15-20, of the officer.
- b. To attend Young Adults Camp, the child or sibling must have turned 15 by the last day of the program and not be over the age of 20 when the program starts.
- c. Surviving children whose officer died by suicide are eligible to attend Young Adults Camp if the officer's suicide occurred on OR after January 1, 2019 and a PSOB claim is in the process of being filed or has been filed.

3. C.O.P.S. Outward Bound® Adventure:

- a. Outward Bound® is an adventure-based program for teenagers and young adults, ages 15-20, who are surviving children of the officer as defined in SOP 3.0, paragraph 3.16.
- b. Due to Outward Bound® permit regulations, space is limited. Priority is given to the registrations of first and second time attending surviving children. The next priority will go by registration date.
- c. In order for these priorities to be met, the registration of the child must have been received by the registration deadline.
- d. To attend Outward Bound®, the child must have turned 15 by the last day of the program and not be over the age of 20 when the program starts.
- e. Outward Bound® has a separate screening process to ensure the safety of the participants. Ultimately, it is the decision of Outward Bound® if the survivor is physically capable to attend.
- f. Surviving children whose officer died by suicide are eligible to attend Outward Bound ® if the officer's suicide occurred on OR after January 1, 2019 and a PSOB claim is in the process of being filed or has been filed.

4. C.O.P.S. Adult Children's Weekend:

- a. C.O.P.S. Adult Children's Weekend is planned for surviving adult children.
- b. Survivors may, optionally, bring their spouse/domestic partner to this weekend.
- c. All attendees must be 21 years of age by the first day of the weekend.
- d. Suicide survivors must have an approved PSOB claim to be eligible to attend this program.

5. C.O.P.S. Spouses Weekend:

- a. C.O.P.S. Spouses Weekend is planned for surviving spouses.
- b. To attend this weekend, the survivor has to have been the legally married spouse at the time of the officer's death. C.O.P.S. recognizes that spouses' survivor issues can be different than other categories of survivors. Therefore, C.O.P.S. will require that a legal marriage has taken place for the survivor to attend
- c. All attendees must be 21 years of age by the first day of the weekend.
- d. Suicide survivors must have an approved PSOB claim to be eligible to attend this program.

6. C.O.P.S. Fiancés & Significant Others Weekend:

- a. C.O.P.S. Fiancés & Significant Others Weekend is planned for surviving fiancé/fiancée and significant others as defined in SOP 3.0, paragraph 3.16.
- b. All attendees must be 21 years of age by the first day of the weekend.
- c. Suicide survivors must have an approved PSOB claim to be eligible to attend this program.

7. C.O.P.S. Siblings Weekend:

- a. C.O.P.S. Siblings Weekend is planned for surviving siblings.
- b. Survivors may, optionally, bring their spouse/domestic partner to this weekend.
- c. All attendees must be 21 years of age by the first day of the weekend.
- d. Suicide survivors must have an approved PSOB claim to be eligible to attend this program.

8. C.O.P.S. Extended Family Weekend:

- a. C.O.P.S. Extended Family Weekend is planned for surviving extended family members.
- b. Eligible family members include grandparents, aunts, uncles, nieces, nephews, cousins, grandchildren and in-laws (on the spouse's side of the family). Other relatives and friends are not eligible to attend.
- c. Survivors may, optionally, bring their spouse/domestic partner to this weekend.
- d. All attendees must be 21 years of age by the first day of the weekend.
- e. Suicide survivors must have an approved PSOB claim to be eligible to attend this program.

9. C.O.P.S. Parents Weekend:

- a. C.O.P.S. Parents Weekend is planned for surviving parents and step-parents.
- b. Survivors may, optionally, bring their spouse/domestic partner to this weekend.
- c. Suicide survivors must have an approved PSOB claim to be eligible to attend this program.

10. C.O.P.S. Co-Workers Weekend:

- a. C.O.P.S. Co-Workers Weekend is planned for surviving co-workers, as defined in SOP 3.0, paragraph 3.16, active or retired.
- b. All attendees must be 21 years of age by the first day of the weekend.
- c. Surviving Co-Workers whose officer died by suicide are eligible to attend Co-Workers Weekend if the officer's suicide occurred on OR after January 1, 2019 and a PSOB claim is in process of being filed or has been filed. Co-workers whose officer died by suicide prior to January 1, 2019 can register to attend this weekend through Survivors of Blue Suicide (SBS) by going to their website at www.survivorsofbluesuicide.org/retreats.

11. C.O.P.S. Co-Workers for Couples Weekend:

- a. C.O.PS. Co-Workers for Couples Weekend is planned for surviving co-workers, as defined in SOP 3.0, paragraph 3.16, active or retired, and their spouse/domestic partner.
- b. All attendees must be 21 years of age by the first day of the weekend.
- c. Suicide survivors must have an approved PSOB claim to be eligible to attend this program.

12. C.O.P.S. Spouses for Couples Weekend:

- a. C.O.P.S. Spouses for Couples Weekend is planned for surviving spouses and their new spouse/domestic partner.
- b. All attendees must be 21 years of age by the first day of the weekend.
- c. Suicide survivors must have an approved PSOB claim to be eligible to attend this program.

13. C.O.P.S. Suicide Survivors Summer Weekend:

- a. C.O.P.S. Suicide Survivors Summer Weekend is planned for surviving spouses, fiancés, significant others, adult children and their spouses, surviving spouses' parents/stepparents, surviving spouses' siblings and grandchildren of law enforcement suicide.
- b. The suicide of the law enforcement officer must have occurred on OR after January 1, 2019, to be eligible to attend the weekend. Survivors whose officer

- died by suicide prior to January 1, 2019 can register to attend this weekend through Survivors of Blue Suicide (SBS) by going to their website at www.survivorsofbluesuicide.org/retreats.
- c. All attendees must be 21 years of age by the first day of the program.
- d. Suicide survivors who wish to attend a survivor specific weekend must have an approved PSOB claim to be eligible to attend. If a suicide survivor is eligible and chooses to attend their survivor specific weekend, they will not be eligible to attend the suicide survivor summer weekend within the same year.

14. C.O.P.S. Suicide Survivors Fall Weekend:

- a. C.O.P.S. Suicide Survivors Fall Weekend is planned for surviving parents, stepparents, siblings, grandparents, and other extended family of the law enforcement officer who died by suicide.
- b. The suicide of the law enforcement officer must have occurred on OR after January 1, 2019, to be eligible to attend the weekend. Survivors whose officer died by suicide prior to January 1, 2019 can register to attend this weekend through Survivors of Blue Suicide (SBS) by going to their website at www.survivorsofbluesuicide.org/retreats.
- c. All attendees must be 21 years of age by the first day of the retreat.
- d. Suicide survivors who wish to attend a survivor specific weekend must have an approved PSOB claim to be eligible to attend. If a suicide survivor is eligible and chooses to attend their survivor specific weekend, they will not be eligible to attend the suicide survivor fall weekend within the same year.
- C. C.O.P.S. reserves the right to make exceptions to the above guidelines. Individuals whose circumstances do not meet the above criteria but wish to be considered eligible for a program, must apply with the National Office and be approved for inclusion by the Executive Director. If the individual does not agree with the decision of the Executive Director, they can appeal this decision with the C.O.P.S. National Board.

13.5. REGISTRATION:

- A. To provide sufficient information to participants and staff on how to handle registrations, handle cancellations, and information on travel assistance to any program.
- B. Registrations shall be submitted no later than the deadline date indicated on the brochure/postcard and website for the specific program.
- C. Participants will follow the C.O.P.S. Code of Conduct, SOP 22.0, while attending their program. After registration has been received at the National Office, participants will be sent the C.O.P.S. Code of Conduct to review. Participants will be required to sign a form that indicates they have received, read and will adhere to the guidelines set forth in the Code of Conduct.

13.6. CANCELLATIONS:

A. Cancellations may be made by calling the Programs Department at the National Office, or in writing, conventional mail or email is acceptable.

B. Participants who fail to cancel before the program start date without providing documentation of the extenuating or mitigating circumstances will be subject to the following terms:

1. First occurrence:

- a. C.O.P.S. will require an initial security deposit of \$150 before their registration is accepted for their next eligible program.
- b. After receipt of this deposit, C.O.P.S. will register the survivor.
- c. Once the participant has completed the program, they will receive their deposit back.
- d. If the survivor does not attend that program, C.O.P.S. will not return the security deposit to the survivor.

2. All other occurrences:

- a. C.O.P.S. will require an initial security deposit of \$300 before their registration is accepted for their next eligible program.
- b. After receipt of this deposit, C.O.P.S. will register the survivor.
- c. Once the participant has completed the program, they will receive 50% of their deposit back.
- d. If the survivor does not attend that program, C.O.P.S. will not return any of the deposit to the survivor.

13.7. TRAVEL ASSISTANCE:

- A. When seeking travel assistance, the participant must take these steps before consideration for National C.O.P.S. travel assistance:
 - 1. Contact your local C.O.P.S. chapter some chapters offer financial assistance to survivors for their attendance at programs. If the chapter does not offer, or cannot grant the participant travel assistance, the participant can apply for financial assistance through National C.O.P.S.
 - 2. National C.O.P.S. staff may request documentation proving the participant was denied travel assistance or may contact the chapter to confirm.
- B. Travel assistance to programs is generously provided by National C.O.P.S. donors. The amount of assistance is dependent on donations and other funds set aside for certain programs; therefore, the availability of travel assistance funds is not guaranteed. This amount fluctuates, so contact the Programs Department at the National C.O.P.S. Office for the current travel assistance application which will indicate that year's assistance amount.
 - 1. Travel assistance applications must be submitted 30 days prior to the program to be considered.
 - 2. Due to the limited amount of travel assistance available, priority will be given to applications received from survivors who are attending the program for their first or second time.

- 3. Travel assistance checks will be made payable to the survivor requesting the assistance, unless a minor child, which would then be made payable to the minor child's parent or legal guardian.
- 4. Travel assistance checks will be distributed to the survivor on the last day of the program, assuring that the program was successfully completed.
- C. This assistance may be available prior to the event if it is necessary for the participants to attend. Contact National C.O.P.S. for more information.
 - 1. Anyone receiving this assistance and who then fails to participate in their specific program will be required to return the full amount granted to National C.O.P.S.
 - 2. If the participant fails to do so, that survivor shall be denied access to all eligible programs until the full amount granted is returned to National C.O.P.S.
- D. Any survivor receiving financial support from their local C.O.P.S. chapter to attend a program shall not be eligible for travel assistance from National C.O.P.S. unless the granted amount from the chapter is not enough for the survivor to attend the program.

Approved by the National Board January 31, 2021 Amended by the National Board July 24, 2025

14.0. FINANCIAL POLICY

14.1. SCOPE:

A. This Standard Operating Procedure establishes a breakdown of how C.O.P.S. funds shall be invested.

14.2. OBJECTIVE:

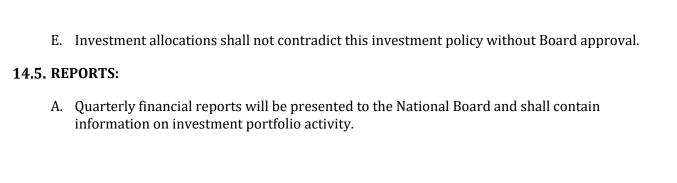
A. This policy is to develop a diversified, moderate risk portfolio of investments for future financial stability of our non-profit organization. Those with fiduciary responsibilities over these funds should realize that this organization's money will be invested in a way that will exceed inflation with moderate risk.

14.3. INVESTMENT BREAKDOWN:

- A. The Executive Director should follow the below general considerations when making financial decisions on investments.
- B. The Executive Director may, upon advice from the Trust Advisor, vary somewhat from these percentages if recommended by the advisor. Any variation shall be reported to the Board.
 - 1. Approximately 40-50% of investments shall be in income investments.
 - 2. Approximately 20-30% of investments shall be in growth and income investments.
 - 3. Approximately 10-20% of investments shall be in growth investments.
 - 4. Approximately 5-15% of investments shall be in aggressive investments.
 - 5. Approximately 15-30% of investments shall be in international investments.
 - 6. Approximately 0-10% of funds shall be kept in cash for financial liquidity. Note: Liquid investments do not include the operating funds of C.O.P.S. kept in a money market account that should not exceed \$800,000.00.

14.4. FINANCIAL POLICY REVIEW:

- A. The National Board of Concerns of Police Survivors shall re-evaluate this investment strategy at least once every two years or sooner, ensuring a balanced approach with earned income from the investments fund.
- B. After this review, the National Board shall delegate responsibility to both the Executive Director and the Financial Manager to decide if, when, and how much money can be transferred from the money market account to C.O.P.S. financial advisors for investing without approval of, but with notification to the Board.
- C. When money is invested with advice from the financial advisor, the Board shall be notified of the investments made.
- D. The Executive Director and Financial Manager jointly must agree to movements of investments within accounts; but at no time may investments be liquidated and transferred into a money market or used for any other purposes besides reinvestment without Board approval.



SOP 14.0 adopted July 13, 2014

15.0. RECORDS MANAGEMENT AND DISPOSITION OF FILES AND DOCUMENTS - DOCUMENT RETENTION, STORAGE, AND DESTRUCTION [SHORT TITLE: DOCUMENT RETENTION POLICY

15.1. SCOPE AND OBJECTIVE:

THIS STANDARD OPERATING PROCEDURE:

- A. Covers how files/documents of Concerns of Police Survivors (C.O.P.S.), regardless of physical form shall be retained.
- B. Contains guidelines for how long certain files/documents should be kept.
- C. Provides guidelines as to how files/documents should be destroyed.
- D. Is designated to:
 - 1. Ensure compliance with federal and state laws and regulations
 - 2. Eliminate accidental or innocent destruction of files/documents
 - 3. Facilitate the operations of C.O.P.S. by promoting efficiency and freeing up valuable storage space

15.2. APPLICABILITY:

This Standard Operating Procedure applies to the C.O.P.s. National Office to determine which files/documents must be retained and/or destroyed.

15.3. GENERAL INFORMATION:

- A. Federal and state laws require organizations to maintain certain types of files/documents for a certain period of time (see Attachment 1 for schedule). This Document Retention Policy (DRP) is to ensure the most efficient and effective operation of Concerns of Police Survivors (C.O.P.S.) National Office. The files/documents of C.O.P.S. are important to the proper functioning of the organization and include virtually all of the files/documents produced at the National Office. Such files/documents can be in electronic or paper form. Thus, items that may not be considered important, such as interoffice emails and printed memoranda are files/documents that may be considered important under this policy. If ever uncertain as to any procedures set forth in this policy, e.g., what files/documents to retain or destroy, when to do so, or how, it is the responsibility of the individual to seek answers from the local designated DRP Manager, or the Executive Director.
- B. The goals of this DRP are to:
 - 1. Retain important files/documents for reference and future use.
 - 2. Delete or destroy files/documents that are no longer necessary for the proper functioning of the organization.
 - 3. Organize important files/documents for efficient retrieval.

- 4. Ensure what files/documents should be retained, the length of their retention, the means of storage, and when and how they should be destroyed.
- C. "Files/documents" discussed herein refers to all business files/documents of C.O.P.S. and is used interchangeably with "documents", including written, printed, and recorded materials, as well as electronic files/documents, e.g. emails and documents saved electronically. Therefore, any electronic files that fall into one of the document types in Attachment 1 will be maintained for the appropriate amount of time. If there is sufficient reason to keep an email message, the message should be printed in hard copy and kept in the appropriate file or moved to an "archive" computer file folder. Business files/documents shall be retained for a period no longer than necessary for the proper conduct and functioning of the organization.
- D. Suspension of Record Disposal in the Event of Litigation or Claims:
 - 1. No director, National officer, employee, volunteer or agent of C.O.P.S. shall destroy, dispose of, conceal, or alter any record of document while knowing that it is or may be relevant to an anticipated or ongoing investigation or legal proceeding conducted by or before a federal, state or local government agency, including tax and regulatory agencies, law enforcement agencies and civil and criminal courts, or an anticipated or ongoing internal investigation, audit or review conducted by C.O.P.S.
 - 2. During the occurrence of an anticipated or ongoing investigation, lawsuit filed or imminent, or legal proceedings as set forth above, the Executive Director shall suspend any further disposal of documents until such time as the Executive Director with the advice of counsel, determines otherwise. The Executive Director shall take such steps as necessary to promptly inform all National Board members and/or staff of any suspension in the further disposal of documents. Should an individual fail to follow this protocol, he/she and/or C.O.P.S. may be subject to fines and penalties, among other sanctions.

15.4. TYPES OF FILES/DOCUMENTS RECORDS:

- A. General: General correspondence includes, but is not limited to any letters, notes, requests, complaints, etc. that are exchanged regarding the organization.
- B. Financial: Financial files/documents include, but are not limited to accounting and corporate tax files/documents, financial statements, ledgers, audit files/documents, invoice and expense files/documents, payroll, etc.
- C. Governance: Files/documents include, but are not limited to Articles of Incorporation, Bylaws, meeting Minutes, deeds and titles, leases, policy statements, contracts and agreements, trademark files/documents, etc.
- D. Grants: Grant files/documents include, but are not limited to any document that is part of a grant request or application, through the acceptance and distribution of such grant funds. This would also include donations that were received by the organization with explicit instructions from the donor on the expenditure of the donation, also known as "restricted funds".

- E. Human Resources and Payroll: Human Resources and Payroll files/documents include, but are not limited to employment applications, background investigations, resumes, letters of recommendation of current and past employees, current and past employee performance evaluations and complaints. Payroll files/documents include, but are not limited to salary history, current rate of pay, payroll deductions, time cards, W-2 and W-4 forms, bonuses, etc.
- F. Legal: Legal files/documents include, but are not limited to all contracts, legal counsel correspondence, trademark and copyright registration.
- G. Marketing: Marketing documents include, but are not limited to proposals, estimates and agreements for projects and programs to promote the organization, raise funds for the organization, and educate the public of the organization and its mission.
- H. Operations: Operations files/documents include, but are not limited to all documents that involve the general operation of the business, e.g., proposals, contracts, agreements such as building/grounds maintenance, utilities, insurance, etc.
- I. Historical: Historical files/documents are those that are no longer of use to the organization, but by virtue of their age or research value may be of historical interest or significance to C.O.P.S.

15.5. RETENTION SCHEDULE AND ADMISTRATION:

- A. Record Retention Schedule is set forth in Attachment 1. The Executive Director shall administer this DRP. The Executive Director is also authorized to:
 - 1. Make modifications to the Document Record Retention Schedule to ensure that it is in compliance with local, state and federal laws including the appropriate document and record categories for C.O.P.S.
 - 2. Monitor local, state and federal laws affecting record retention.
 - 3. Annually review the DRP.
 - 4. Monitor compliance with the DRP.
- B. Files that are to be kept for a designated time period, but are no longer needed in a working area, should be stored in another storage area. The files/documents should be labeled with contents and the dates. These files will be rotated out for destruction as the files/documents become outdated. Files that are to be kept permanently should be organized and contain only the information necessary for archiving and put into a storage box, labeled with the exact contents and dates and taken to a storage area.
- C. Files/documents containing confidential information no longer required or are not considered "final" for the project being worked on should be collected regularly and should be shredded/destroyed. This would include drafts of letters that contain survivor contact information or financial information.
- D. C.O.P.S. official archived files/documents or files/documents initiated/generated and filed/maintained by National Office personnel and National Board members cannot be destroyed until approved by the appropriate authority. The official files/documents

proposed to be destroyed are to be identified/reported/presented to the appropriate authority who will determine if it is proper to destroy the record(s)/file(s) presented and he/she will approve or disapprove the destruction and the method of destruction of the record(s) presented. The DRP Manager will designate the individual(s) who will destroy the record(s)/file(s). If required by the DRP Manager, a Certificate of Files/documents Destruction (Attachment 2 is a sample certificate) will be prepared by the individual who is destroying the files/documents. The Certificate of Destruction will be permanently filed. After the Retention Period, items to be destroyed will be destroyed by shredding. In no circumstances are files/documents to be destroyed merely by discarding in the trash. In addition, destruction must be completed by someone other than the individual authorizing.

15.6. C.O.P.S. NATIONAL OFFICE DRP EMPLOYEE

ACKNOWLEDGEMENT/CERTIFICATION FORM:

Attachment 3 is the C.O.P.S. National Office DRP Employee Acknowledgement/Certification form required to be completed by all employees of the National Office.

SOP 15.0 was voted on by the National Board on January 12, 2019 $\,$

16.0. <u>CONCERNS OF POLICE SURVIVORS SCHOLARSHIP PROGRAM</u>

16.1. SCOPE:

This Standard Operating Procedure (SOP) establishes guidelines for the Concerns of Police Survivors (C.O.P.S.) Scholarship Program.

16.2. OBJECTIVE:

To provide guidelines for submitting a scholarship application by a survivor and the processing of the application by the National Office.

16.3. COMMITTEE:

- A. The Scholarship Committee, hereinafter referred to as the Committee, shall be comprised of three (3) local community leaders living in the Camdenton, MO area. They shall be knowledgeable about education and the law enforcement profession. They shall not be employed by C.O.P.S. In addition, they cannot be the applicant, a relative or a friend of an applicant. The Committee shall be recommended by the Executive Director and appointed by the National President with approval from the National Board for a two-year term.
- B. Each Committee member is required to sign the C.O.P.S. Confidentiality & Nominee Pledge Information Policy form.
- C. The Committee will be appointed at the July Board meeting in odd years for a two-year term.
- D. The Committee will meet a minimum of three (3) times per year, normally after each application deadline (April, June, October).
- E. The Committee will operate independently of C.O.P.S., its National Board, its chapters and its committees.
- F. C.O.P.S. may not influence or override the decision of the Committee.
- G. The Committee shall award scholarships on a uniform, non-discriminatory basis.
- H. The relative weight and importance to the criteria will be the Committee's sole discretion, and the Committee will not be required to apply a rigid selection criteria.
- I. All decisions of the Committee are final.
- J. The National Board of C.O.P.S. will determine the amount of funding set aside for scholarships each year in the annual budget and the Committee will be informed of this amount. The Committee, only with approval of the National Board, will award a scholarship above the determined amount.

16.4. ELIGIBILITY:

- A. Surviving children and surviving spouses of a law enforcement officer who has died in the line-of-duty according to C.O.P.S. criteria shall be eligible provided the survivor is not entitled to a tuition-free education as a state death benefit. If an eligible survivor applies for a state benefit and is denied, the survivor will then become eligible for a C.O.P.S. scholarship. Remarried spouses continue to be eligible for a scholarship.
- B. Survivors who are entitled to a tuition-free education as a state benefit who no longer reside in the state in which the benefit is available will be eligible to apply for a C.O.P.S. scholarship provided the student requesting the scholarship did not relocate to another state just to be eligible for the C.O.P.S. scholarship.
- C. The scholarship shall cover those students enrolled in undergraduate and post-graduate studies at an accredited college or university, or an accredited trade/vocational school.
- D. Before an application is accepted for consideration, survivors' fallen officer shall be approved by one of the following organizations as line-of-duty death, the Federal Bureau of Investigation [FBI], Public Safety Officers' Benefits Program [PSOB], the National Law Enforcement Officers Memorial Fund [NLEOMF], or the Fraternal Order of Police [FOP], according to the Bylaws of Concerns of Police Survivors.
- E. There is no age limit for a survivor to apply for a scholarship.
- F. All applicants shall submit their most recent transcript with GPA (if no grade report is available, attach statements on school letterhead from at least three (3) instructors from classes you are currently enrolled in), a letter of one hundred and fifty (150) words or less to the Committee to include why you want to be a recipient, your proposed occupation/profession and an update on your academic status, the previous semester's invoice/bill (if applicable), and state death benefit denial (if living in a state that provides tuition-free education).

16.5. SCHOLARSHIP AMOUNTS:

- A. Survivors seeking assistance for education shall be limited to \$2,000 per semester, and the total lifetime scholarship award shall not exceed \$16,000.
- B. Financial assistance is based on the amount due to be paid by the student to the institution and the amount of other aid being applied. The number of semester hours does not matter.
- C. No student is guaranteed a scholarship each semester. This is particularly important in cases of a student being on probation (see definition in paragraph 16.9 below) or has not completed a semester.
- D. Scholarships are available as funding allows and at the sole discretion of C.O.P.S.

16.6. DEADLINES:

- A. Survivors applying for the Summer Semester shall have a completed application to the National Office on or before April 1.
- B. Survivors applying for the Fall Semester shall have a completed application to the National Office on or before June 1.
- C. Survivors applying for the Winter/Spring Semester shall have a completed application to the National Office on or before October 1.
- D. A completed application is required for consideration for each semester, and the awarding of a scholarship for any one semester does not guarantee a scholarship for any future semesters.
- E. Incomplete and late applications shall not be considered.

16.7. PAYMENTS:

- A. Payments shall be made directly to the institution with wording that states any unused amount be returned to C.O.P.S. The scholarship letter from C.O.P.S. to the institution clearly states that if any funds are unused that they be returned to C.O.P.S. The institution determines what funds are not used.
- B. Education assistance may only be used for tuition and class fees. A class fee includes lab fees, student development fees, technology fees, course fee, or fees required with enrollment charged to students at a school, college, university or other place of learning that is in addition to any matriculation and/or tuition fees. It does not include room and board, insurance, medical expenses, transportation, expenses for sports, hobbies, noncredit courses and textbooks.
- C. Payment to the institution shall be mailed for the Summer Semester on June 1.
- D. Payment to the institution shall be mailed for the Fall Semester on August 15.
- E. Payment to the institution shall be mailed for the Winter/Spring Semester on December 1.
- F. An official institution's tuition invoice/bill for the semester for which the scholarship is provided by C.O.P.S. must be sent to the C.O.P.S. National Office by the scholarship recipient not later than 30 days following the start of the semester for which the scholarship was received.

16.8. PROCESS:

A. Notice of availability of these scholarships/grants will be, but not limited to, published on the National C.O.P.S. website and in any other National C.O.P.S. publications. Chapters are also encouraged to disseminate information concerning the C.O.P.S. Scholarship Program.

- B. The National Office shall have application forms (see Attachment 1) available. For a form, contact the National Office or go to the National C.O.P.S. website. All completed applications shall be submitted to the National Office by the deadlines specified in paragraph 16.6 of this SOP. An application is required for each semester that a scholarship is requested.
- C. All applications shall be presented to the Committee.
- D. Once the Scholarship Committee completes the selection process, the Committee will notify the National Office of those selected to receive the educational scholarships.
- E. All applicants will be notified by the National Office forty-five (45) days after the application deadline of the final determination.
- F. Information about the scholarship recipients will be published by the National Office.

16.9. DEFINITIONS:

Probation shall be defined as any recipient who, during their C.O.P.S. scholarship semester, withdraws from a class or receives a grade below a C or has submitted applications showing a history of withdrawals and consistent poor academic standing. Applicants who are on probation status will be eligible for C.O.P.S. scholarships, providing they meet all other eligibility requirements, but will be awarded financial assistance only AFTER successfully completing the semester for which they are applying. A transcript must be submitted to the C.O.P.S. National Office within three (3) months of the completed semester. A scholarship recipient will be removed from probation status if they receive a grade of C or above for all courses for which they are enrolled during the probationary period.

Approved SOP 16.0 adopted by the National Board July 13, 2017 Amended 16.7(B) by the National Board February 11, 2019 Amended 16.5(A) by the National Board January 29, 2022 Amended 16.0 by the National Board January 25, 2025

17.0. TRAVEL AND BOARD EXPENSE POLICY

17.1. SCOPE:

- A. This Standard Operating Procedure (SOP) establishes the travel and procurement policy of Concerns of Police Survivors (C.O.P.S.), prescribes procedures for requesting travel, and provides direction for the submission of requests by the National Office Staff, the National Board, etc. for reimbursement for: (1) authorized purchases of supplies, services, and materials; and (2) approved Travel. These policies and procedures are applicable to the C.O.P.S. National Board members, the C.O.P.S. National Office staff, C.O.P.S. volunteers, consultants and contractors.
- B. C.O.P.S. has referred to the U.S. General Services Administration (GSA) regulations as a general guide for reimbursement of travel expenses, but has also included guidelines specific to C.O.P.S. in this policy.
- C. When making decisions on purchases, travel, etc. and being fiscally responsible, choices should be made that are for the good of the C.O.P.S. organization, not the convenience or pleasure of the traveler or purchasing agent.

17.2. DEFINITIONS:

- A. *Incidental Expenses:* When traveling overnight for C.O.P.S. business, travelers are entitled to \$5 per night to cover costs the traveler may incur outside of the costs outlined otherwise in policy.
- B. *Lodging:* Includes expenses for overnight sleeping facilities, room taxes and fees associated with the room, including internet if necessary. It does not include any personal charges to the room, such as room service or in room movies, etc.
- C. *Meals:* Expenses for breakfast, lunch, and dinner. No alcoholic beverages, entertainment expenses, or expenses incurred for other persons are allowable, unless pre-authorized by the Executive Director or the National President.
- D. *Meals and Incidental Expenses (M&IE):* A fixed allowance for breakfast, lunch, dinner, and incidental expenses while in a travel status.
- E. *Per Diem Allowance:* A daily payment instead of actual expenses for lodging, meals and related incidental expenses.
- F. C.O.P.S. Traveler: A Board member, staff member, consultant or other party traveling at C.O.P.S. expense while conducting official C.O.P.S. business.

17.3. AUTHORIZATION OF TRAVEL:

A. Mandatory Board Travel does not require travel pre-approval through the National President and does not count against National Board member's individual Board Expense Account. These Board events are pre-designated as National Board

meetings, National Police Week, Board Chapter Training, Board Team Building, Weekends and Camps for the Board Member's survivorships and other events as directed by the National President or the Executive Director. To be reimbursed for mandatory travel, Board Members must submit a *Travel Expense Report* form (Attachment 2).

- B. National Board Members also have C.O.P.S. National Events they can opt to travel to without pre-approval of the National President. These optional events are not charged to the Board Member's Individual Expense Account. These events are law enforcement conferences/exhibitions in each Trustee's respective region (when assigned by the National President) and the C.O.P.S. National Conference on Wellness and Trauma. To be reimbursed for one of these optional events, Board Members must submit a Travel *Expense Report* form (Attachment 2).
- C. National Board Members each have a limited Individual Board Expense Account. This account is provided to cover travel expenses when traveling within their region. Each use of this account to travel must be pre-approved by the National President (Attachment 1, Request for Approval form) and a signed travel reimbursement form must be submitted to the National Office (Attachment 2, Travel Expense Report form) and a Board Expense Fund Reimbursement form (Attachment 3). This Board Expense Account is intended to be used to attend chapter meetings or events, attend funerals if needed, starting new chapters, assisting a Chapter with a pressing situation, or to attend a C.O.P.S. National Event in the Trustee's region if it is determined there is a need to attend. To be reimbursed from an individual Board Expense Account, the Board Member must submit a Board Expense Fund Reimbursement form (Attachment 3). See paragraph 17.8 for further reference to the Individual Board Expense Account.
- D. The National President and the Executive Director may travel to national conferences and activities at his/her discretion and shall furnish travel reports to the National Board members.
- E. The National Staff members must be pre-authorized for all travel by the C.O.P.S. Executive Director or the Director of Operations.
- F. There is no travel agent used by the C.O.P.S. National Board and National Office staff. Each traveler is responsible to prepare his/her own travel arrangements that are most efficient and economical to the C.O.P.S. organization. A National Board member may receive reimbursement on approved transportation before the trip is taken by submitting a Travel Expense Report form to the National Office with accompanying receipts. If the traveler receives reimbursement from the airline after being reimbursed the original expense by the National Office, the traveler must send the overage to the National Office or must apply the credit received towards another C.O.P.S. trip.

- G. Travel per diem will be advanced, if requested on approved travel, in an amount not to exceed 75% of the estimated travel expense. If the trip is canceled or the actual expenses do not reach the estimated costs, the Board/Staff member will be required to reimburse C.O.P.S.
- H. Past National Presidents attending NPW, seeking reimbursement, shall volunteer their time (in some capacity), for an average of at least two (2) hours/day. Attending events is encouraged. Noncompliance with this expectation can result in the C.O.P.S. National Board voting to modify the reimbursement.

17.4. TRANSPORTATION:

A. When traveling on official C.O.P.S. business, Board members and C.O.P.S. Staff members shall conduct research into the least expensive method to travel to their destination. Time spent traveling and the availability of taxis should also be considered in the decision. If the traveler does not choose the least expensive method of transportation, they must get their travel choice authorized by the C.O.P.S. National President or the Executive Director.

B. Modes of Transportation:

- 1. Privately Owned Vehicle (POV): A POV may be authorized for C.O.P.S. official travel, and mileage will be reimbursed at the rate determined by the U.S. General Services Administration (GSA). Reimbursement is also allowed for parking fees and toll fees. Mileage shall begin and end at either the traveler's home or office.
- 2. Rental vehicle: A rental car may be authorized for C.O.P.S. official travel. This is sometimes less expensive than driving a POV when mileage is considered. This can also be desirable if there are a lot of supplies that may have to be shipped if the traveler chooses POV or air travel. A traveler must first obtain authorization from either the National President or the Executive Director prior to renting a vehicle. C.O.P.S. recommends travelers ensure his/her private insurance company will insure the rental vehicle prior to renting.
- 3. Air Travel: Air travel may be used when it is not cost or time effective to travel via POV or rental vehicle. When booking flights, travelers shall use the following guidelines:
 - a. C.O.P.S. will be responsible for paying the lowest fare possible for a trip. Should a traveler prefer to use another airline or accept a higher fare, the additional charges will be the responsibility of the traveler.
 - b. Penalty fees for ticket changes made for personal reasons are the responsibility of the traveler.

- c. If a traveler misses his/her flight, based on something within the traveler's control, the traveler will be responsible for the difference in cost for the new flight. This will be determined by the National President or the Executive Director.
- d. If a C.O.P.S event is canceled or a flight is missed due to something outside of the control of the traveler, C.O.P.S. will be responsible for the associated costs of the flight, but will also retain control of any airline credit to be used for another flight.
- e. If a traveler chooses to take an indirect route or have travel interrupted by personal business, reimbursement is limited to that which would have been paid for uninterrupted travel.
- f. C.O.P.S. will cover the costs of two checked bags per flight, unless prior authorization is given for more checked bags by the C.O.P.S. National President or the Executive Director.

17.5. MISCELLANEOUS EXPENSES:

- A. There are other Miscellaneous Expenses allowable while on authorized travel. The following can be submitted for reimbursement:
 - 1. Tips for handling baggage, C.O.P.S. property, taxis or other transportation costs will be reimbursable up to \$10 per trip. If a tip is \$10 or less, no receipt is required. Tips for meal service are included in the per diem rate.
 - 2. Internet fees, if internet is required and is not free.
 - 3. Business costs, such as printing.
 - 4. Room rentals for business purposes, other than lodging.
 - 5. Baggage costs from airlines or storage costs at a hotel/conference center.
 - 6. Other expenses made necessary by the travel status, as approved by the National President or the Executive Director.
- B. Receipts are required to be submitted with a claim for reimbursement for miscellaneous expenses. If a receipt is not available, lost or damaged, there must be an explanation as to why there is no receipt with the reimbursement claim. C.O.P.S. may refuse to reimburse a claim without a receipt.
- C. Receipts must be dated/received within 30 days from the completion of travel, 60 days from the time of the purchase to be considered.

D. Alcohol is not considered a reimbursable expense for C.O.P.S. Exceptions to this must be pre-approved by the National President or the Executive Director.

17.6. PER DIEM:

- A. C.O.P.S. uses per diem rates as determined by GSA at: **gsa.gov**. C.O.P.S. adjusted rates are changed each year on October 1st, using the GSA rates that are set on the GSA website.
- B. Using per diem rates is preferred over submitting receipts for meals while traveling.
- C. Travelers may submit a request for \$5 for incidentals each day only on the days in which require overnight lodging.
- D. When making lodging arrangements, travelers are encouraged to find hotels that fall within the per diem rates for that part of the country. Travelers should submit receipts for lodging with the *Travel Expense Report* form (Attachment 2)
- E. If a meal or lodging is provided at a C.O.P.S. event or by an outside source during travel, those meals/lodging nights should be noted and deducted from the request for per diem for that day.
- F. Per Diem is only authorized when the traveler is traveling more than 50 miles from his/her home or office.
- G. Entitlement to per diem begins when the traveler leaves his/her home or office and returns when he/she returns to his/her office or home.
- H. If there are multiple travelers for C.O.P.S. going to the same event, those of the same sex will be assumed to share a room. If a Board Member opts to keep a private room, they will be personally responsible for one half of the costs of the room.
- I. When a C.O.P.S. traveler elects to stay with personal friends or family, the traveler may only be reimbursed the actual out of pocket expenses incurred by the hosts.
- J. If a C.O.P.S. traveler is unable to arrive by 9:00 PM on the day before the event starting the next morning, the traveler will be allowed to come in a day earlier.
- K. Tips for meals are included in the per diem rates for meals and expenses and shall not be submitted separately.

17.7. CLAIMS FOR REIMBURSEMENT:

A. Requests for reimbursement must be submitted to the National Office within 30 days from the day the travel is completed.

- B. Receipts are required for each expense claimed other than per diem, mileage, and miscellaneous tips. Receipts must be dated within 60 days of their arrival at the C.O.P.S. National Office for consideration.
- C. For travel and travel-related claims, the claim must be submitted using the appropriate form(s) found on the Attachment(s) to this SOP. Additionally, travelers may be requested to attach an activity report describing business handled, contacts made, etc.
- D. For non-travel related claims, you must submit a Travel Expense Report form (Attachment 2) and attach receipts for any purchase(s). An approval by the National President (Attachment 1) prior to the expenditure for the expense must be provided at the time of the claim for reimbursement.
- E. Reimbursement checks will be issued within two weeks of receipt in the National Office provided that all documentation is acceptable. Incomplete documentation will delay, reduce, or negate the reimbursement.

17.8. C.O.P.S. NATIONAL BOARD INDIVIDUAL BUDGET:

- A. The purpose of the National Board Individual budget account is to reimburse expenses incurred at the local, state, and regional level by members of the National Board as they perform the Duties of the Officers as described in Article VII of the Bylaws of Concerns of Police Survivors, Inc. This budget amount is contained in the C.O.P.S. budget request submitted by the Executive Director and must be approved by the National Board.
- B. National Board members can be reimbursed for reasonable business expenses needed to fulfill his/her duties as a National Board member. The National Board Individual Budget Account is used to meet the expenses of local C.O.P.S. business travel within the officer's region, expenses of lodging and meals associated with such business travel, committee work for the National Board and the expenses of running an office out of the home including telephone expenses, postage, office supplies, fax and copy service.
- C. Unless approved by the National Board, an amount not to exceed \$3,500 per year can be reimbursed to each Region Trustee and Immediate Past President for travel and other expenses.
- D. Unless approved by the National Board, an amount not to exceed \$7,000 per year can be reimbursed to the National President for travel and other expenses.
- E. Unless approved by the National Board, the Past Presidents of C.O.P.S. as ex-officio members of the National Board, can be reimbursed an amount not to exceed \$500 per year in the aggregate, with no one Past President receiving reimbursement greater than \$100 per year for travel and other expenses. Reimbursements for Past

Presidents shall be limited to actual charges incurred in the performance of committee work for the National Board.

- F. Travel expenses reimbursed by the National Board Individual Budget Account must meet the guidelines established by this SOP.
- G. Purchases of items over \$100 shall have prior approval of the National President to be considered for reimbursement and must be accompanied by written authorization for the purchase prior to the actual purchase.
- H. Items purchased over \$100 will remain the property of National C.O.P.S.
- I. When a National Board member who has possession of C.O.P.S. property is no longer a National Board member, within thirty days, the property will be:
 - 1. Sent to the National Office; or
 - 2. Sent to the new National Board member serving in the same capacity; or
 - 3. Purchased by the departing National Board member at the following rate:
 - a. Within 1 year of purchase, 100% of the purchase price
 - b. Within 2 years of the purchase, 75% of the purchase price
 - c. Within 3 years of the purchase, 50% of the purchase price
 - d. After 3 years of purchase, 25% of purchase price
- J. Other items for reimbursement must have the prior written approval of the National President.
- K. The National Office staff has the responsibility of reporting to the National President any questionable charges of the National Board budget for clarification of direction.
- L. Should there be a need to fill a vacancy on the National Board, the appointee to the appointed position shall inherit the National Board budget balance from the officer who vacated the position.
- M. The allocated budget amount for the National Board members is effective on the date of election of the National Board each year.

17.9. TRAVEL REQUEST FORMS:

SEE THE ATTACHMENT FOR SAMPLE FORMS AND GUIDANCE FOR COMPLETION OF THE FORMS

This SOP 17.0 TRAVEL AND BOARD EXPENSE POLICY of CONCERNS OF POLICE SURVIVORS, INC. replaces and supersedes TRAVEL POLICY of CONCERNS OF POLICE SURVIVORS, INC., Adopted by the National Board, February 28, 1994 and all subsequent revisions, the C.O.P.S. BOARD EXPENSE FUND PROCEDURE, Approved July 12, 1996, and all previous documents pertaining to the C.O.P.S. Travel Policy, the National Board Expense Fund, and the National Board budget.

Approved SOP 17.0 adopted by the National Board November 1, 2017 Amended 17.8 (C) by the National Board May 11, 2022 Amended 17.6 (A) by the National Board January 28, 2023 Amended 17.8 (D) by the National Board January 18, 2024 Amended 17.3 (A) by the National Board July 24, 2025

18.0. <u>CONCERNS OF POLICE SURVIVORS (C.O.P.S.) PROCUREMENT POLICY</u>

18.1. SCOPE:

This Standard Operating Procedure (SOP) is to support and enhance the mission of Concerns of Police Survivors (C.O.P.S.) in a financially responsible manner. It establishes sound purchasing policies and procedures based upon laws, regulations and high ethical standards in order to promote confidence and trust in this non-profit organization.

18.2. OBJECTIVE:

This SOP sets forth the purchasing policy of the National Office of C.O.P.S. as adopted by the National Board. This SOP is not intended to address every issue, exception or contingency that may arise in the course of purchasing activities, but rather prescribes basic standards to be applied in all situations. The National Office of C.O.P.S. will comply with the Code of Federal Regulations (CFR), specifically 2 C.F.R§200.326.

Additionally, the basic standard that should always prevail is the exercise of good judgement in the use and stewardship of our resources.

18.3. TAX EXEMPT STATUS:

- A. C.O.P.S. is a 501(c)(3) non-profit organization created by Charter by the State of Maryland in 1984. National C.O.P.S. is exempt from Missouri Sales Tax, Use Tax, Retailers' Occupation Tax, Service Occupation Tax (both state and local), and Service Use Tax in the State of Missouri.
- B. National C.O.P.S. tax exempt status is to be used exclusively to make purchases for use by the C.O.P.S. National Office and is not for personal use by other individuals, employees, staff, or Board members. Any purchase must be C.O.P.S. related and paid for through C.O.P.S. funds.

18.4. FULL AND OPEN COMPETITION:

All procurement transactions must be conducted in a manner that provides for full and open competition, consistent with procurement standards. In addition:

- A. Contractors that develop draft statements of work, requirements, specifications, or invitations for bids or requests for proposals must be excluded from competing for those procurements.
- B. No unreasonable requirements can be made in order to qualify for competition.
- C. No unreasonable requirements can be made requiring unnecessary experience or excessive bonding.
- D. Engaging in noncompetitive practices between firms and non-competitive contracts with consultants on retainer is prohibited.
- E. Specifying "brand name" products without a provision for an equivalent product is prohibited.
- F. Arbitrary actions in the procurement process are prohibited.

G. Entering into a procurement contract under a federal award with any entity/individual that is suspended/Disbarred from such contracts is prohibited. Prior to entering into a contract, the "Excluded Parties List" through sam.gov must be checked.

18.5. TYPES OF PURCHASES:

A. Micro Purchases:

- 1. those supplies or services where the aggregate dollar amount of which does not exceed the threshold of \$3,500;
- 2. may be awarded without soliciting competitive quotations if the purchaser considers the price to be reasonable;
- 3. to the extent practicable, should be distributed equitably among qualified suppliers;
- 4. in excess of \$100 must be pre-approved by a C.O.P.S. Supervisor.

B. Small Purchases:

- 1. those services, supplies, or other property that do not cost more than the Simplified Acquisition Threshold of \$150,000;
- 2. when the purchase is anticipated to exceed the micro-purchase threshold of \$3,500, at least three (3) vendors should be solicited for price, availability, delivery, etc.;
- 3. quotes can be obtained by telephone, electronically, or for more complex purchases written quotes shall be obtained;
- 4. the purchase is awarded to the vendor quoting the lowest price, including consideration of all other factors:
- 5. supporting documentation must be maintained with the record of the purchase;
- 6. all Small Purchases in excess of \$3,500 must be approved by the Executive Director or the Deputy Director.
- C. Sealed bids or competitive proposals are required for any purchase over the threshold of \$150,000:
 - 1. this is a formal process in which formal solicitation is required;
 - 2. the contract shall be awarded to the bidder of the proposal in which all the prescribed work will be done at the lowest price;
 - 3. a price and cost analysis shall be completed prior to the receiving of bids or proposals to ensure the total price/cost of the contract is fair and reasonable;
 - 4. the Executive Director or National Board can choose to require formal bids or proposals on important projects that do not reach the \$150,000 threshold.
- D. Non-Competitive Proposals (Sole Source Contracting) can be used ONLY in these specific circumstances:
 - 1. the item or service is only available from a single source;
 - 2. there is an emergency for the requirement that will not allow the delay for a competitive solicitation;

- 3. a granting agency expressly authorizes non-competitive proposals in response to a written request;
- 4. after solicitation from a number of sources, competition is determined inadequate;
- 5. prior approval is required for all proposed sole source contracts over the \$150,000. If the project is grant funded, the grant agency must approve the contract. If the project is not grant funded, the National Board must authorize the sole source contract;
- 6. if the purchase is justified as sole source, a Justification for Non-Competitive Procurement form (Attachment 1) must be completed and included in the documentation of the purchase.

18.6. C.O.P.S. CREDIT CARD PURCHASES:

- A. Business credit cards may be issued and used by full time employees for C.O.P.S. business only.
- B. The purchasing rules set forth in SOP 18.0, paragraphs 18.5 A and 18.5 B above must still be followed
- C. Strict monthly credit limits shall be set by the Administrative Director and approved by the Executive Director or Deputy Director.
- D. The monthly credit card statement shall be reviewed and approved each month by the Administrative Director and the Executive Director or Deputy Director.
- **E.** Credit cards shall only be used with the prior approval of a C.O.P.S. Supervisor.

18.7. PETTY CASH:

- A. The Administrative Director is authorized to maintain a locked petty cash drawer to accommodate small dollar requirements.
- B. Only the Administrative Division, Deputy Director, and Executive Director shall be given access to the locked petty cash drawer.
- C. Any change in designated personnel shall require a change to the lock of the petty cash drawer.
- D. Cash advances may be made and reconciled with a paid invoice at the completion of the purchase.
- E. The purchasing rules set forth in SOP 18.0, paragraphs 18.5 A and 18.5 B above must still be followed.
- F. An audit of the fund shall be conducted every six (6) months by the Deputy Director and an annual audit of the fund will be conducted by an "outside" auditor.
- G. Reconciliation of all purchases to the invoices from petty cash monthly. The Administrative Division will reconcile the petty cash fund monthly.

18.8. SPLITTING OF PURCHASES:

A. No purchases can be intentionally split to circumvent the dollar threshold limitations.

B. As part of the audit process, auditors will be requested to review financial records for evidence of purchase splitting.

18.9. DOCUMENTATION/RECORDS RETENTION:

- A. All purchases using C.O.P.S. funds shall be documented by a receipt or formal documentation of the purchase process.
- B. Meals while in travel, per diem status, do not require a receipt.
- C. In the event a receipt is lost, every effort shall be made to obtain a replacement receipt or other evidence of the purchase.
- D. Every lost receipt must be reported to the C.O.P.S. Executive Director and/or Deputy Director to authorize payment or reimbursement.
- E. The Executive Director and/or Deputy Director can refuse reimbursement when a receipt is lost.
- F. Records of a procurement in sufficient detail will be kept for a period of seven (7) years.

18.10. PROCUREMENT CODE OF CONDUCT:

- A. No staff member or Board member of C.O.P.S. shall participate in selection, award, or administration of a contract if a conflict of interest, real or apparent, would be involved.
- B. A conflict is apparent when:
 - 1. the staff member or Board member, or
 - 2. any member of his/her immediate family, or
 - 3. his/her partner, or
 - 4. any organization which employs, or is about to employ, has a financial or other interest in or receives or stands to receive a tangible personal benefit from a firm being considered as a vendor for or a contractor with C.O.P.S.
- C. C.O.P.S. staff members and Board members are prohibited from accepting gifts, favors, gratuities, or anything of monetary value from contractors or vendors. Unsolicited gifts of non-substantial value can be accepted with due diligence always being paid to the appearance of a conflict of interest.
- D. For additional conflict of interest information, see C.O.P.S. National SOP 10.0 Conflict of Interest Policy.

Approved SOP 18.0 adopted by the National Board November 1, 2017
Approved changes to SOP 18.6 & 18.7 by the National Board March 20, 2018
Approved changes to SOP 18.0 (Control # 0156-01) "change from Director of Operations to Deputy Director and Admin. Director from Financial Manager by the National Board June 22, 2020

19.0. ACCOUNTING POLICIES AND PROCEDURES OF C.O.P.S., INC

19.1. SCOPE:

- A. The purpose of this Standard Operating Procedure (SOP) is to describe all accounting policies and procedures currently in use at Concerns of Police Survivors (C.O.P.S.) and to ensure that the financial statements conform to generally accepted accounting principles; assets are safeguarded; guidelines of grantors and donors are complied with; and finances are managed with accuracy, efficiency, and transparency.
- B. All C.O.P.S. National Office staff with a role in the management of fiscal and accounting operations are expected to comply with the policies and procedures in this SOP.
- C. These policies will be reviewed annually and revised as needed by the staff and approved by the Executive Director and the National Board.

19.2. DIVISION OF RESPONSIBILITIES:

The following is a list of who has fiscal and accounting responsibilities:

A. National Board:

- 1. Reviews and approves the annual budget
- 2. Reviews annual and quarterly financial statements and information
- 3. Reviews Executive Director's performance annually and establishes the salary
- 4. Ensures that a yearly audit of the financial records of C.O.P.S. is conducted by a Certified Public Accountant (CPA)

B. Executive Director:

- 1. Reviews and approves all financial reports including cash flow projections
- 2. Sees that an appropriate budget is developed annually
- 3. Approves all program expenditures
- 4. Reviews and signs issued checks and/or directs the Deputy Director to do so
- 5. Reviews, approves and signs contracts and approves contract signing procedures incompliance with SOP 18.0, paragraph 18.5
- 6. Reviews and approves all Federal Grant submissions
- 7. Approves inter-account bank transfers
- 8. Is one of four on-site signatories for all bank accounts
- 9. Initiates the actions necessary to have an independent accounting firm that is CPA qualified to conduct an annual audit and files appropriate federal and state tax returns
- 10. Oversees the adherence to all internal controls

C. Deputy Director:

- 1. May review and sign issued checks per procedures directed by the Executive Director
- 2. Reviews and signs contracts in compliance with SOP 18.0, paragraph 18.5

- 3. Is one of four on-site signatories for all bank accounts
- 4. Audits petty cash every six (6) months
- 5. Oversees the adherence to all internal controls

D. Administrative Division:

- 1. Approves all program expenditures
- 2. Monitors program budgets
- 3. Reviews all payrolls
- 4. Reviews and manages cash flow
- 5. Reviews and approves all reimbursements and fund requests
- 6. Processes all inter-account bank transfers
- 7. Assists Executive Director with the development of annual and program budgets
- 8. Reviews all incoming and outgoing invoices
- 9. Manages the petty cash fund
- 10. Receives all incoming accounting department mail
- 11. Monitors and manages all expenses to ensure most effective use of assets
- 12. Monitors grant reporting and appropriate release of temporarily restricted funds
- 13. Oversees expense allocations
- 14. Monitors and makes recommendations for asset retirement and replacement
- 15. Reviews, revises, and maintains internal accounting controls and procedures
- 16. Reviews all financial reports
- 17. Overall responsibility of data entry into accounting system and integrity of accounting system data
- 18. Processes invoices and prepares checks for signature
- 19. Makes bank deposits
- 20. Processes payroll
- 21. Maintains General Ledger
- 22. Prepares monthly and year-end financial reports
- 23. Reconciles all bank accounts
- 24. Mails vendor checks
- 25. Manages Accounts Receivable and Accounts Payable

19.3. CHART OF ACCOUNTS AND GENERAL LEDGER:

- A. C.O.P.S. has designated a *Chart of Accounts* specific to its operational needs and the needs of its financial statements. The *Chart of Accounts* is structured so that financial statements can be shown by natural classification (expense type) as well as by job classification (program vs. fundraising vs. administration). The Administrative Director is responsible for maintaining the *Chart of Accounts* and revising as necessary.
- B. The *General Ledger* is automated and maintained using the accounting software. All input and balancing are the responsibility of the Administrative Division, but is the ultimate responsibility of the Administrative Director.
- C. The Administrative Director should review the *General Ledger* on a periodic basis for any annual transactions.

19.4. CASH RECEIPTS:

- A. Cash receipts generally arise from:
 - 1. Federal Grants
 - 2. Direct donor contributions
 - 3. Fundraising activities
- B. The principal steps in the cash receipts process are:
 - 1. The Receptionist receives incoming mail, opens, date stamps, and distributes the mail. Checks are given to the Development Office. The Development Office enters all checks into the database, stamps all checks "for deposit only," and keeps a copy of each check. The checks are kept in a locked cabinet until handed to the Financial Division for review before processing and deposit.
 - 2. Weekly, or more often if necessary, the Development Office submits the endorsed checks along with the account designation to the Administrative Division for processing. The Administrative Director reviews the account designations, makes copies of the checks, prepares an internal deposit ticket and enters the detail into the accounting system. The Administrative Director then passes the deposit and checks to the Accountant to deliver to the bank for deposit. A copy of the deposit slip is attached to the internal deposit ticket and sent to the Executive Director or Deputy Director for review and approval. Once approved, the internal deposit tickets and receipts are filed.
 - 3. All cash received will be counted and verified by two different staff members. The cash will immediately be posted using the appropriate allocation. The cash will be kept in a locked, secure location and deposited within 24 business hours, if not entered into petty cash. For cash entered into petty cash, it will be assigned a receipt number and dual counted by the employee submitting it and the Administrative Director or the Accountant. Petty cash will be reconciled monthly.
 - 4. Federal Grant funds are only received through electronic draw down by the Administrative Division through the DOJ/BJA grant process. Federal Grant funds are NEVER co-mingled with any other monies. Funds are deposited and expenditures paid out of an account that is exclusively used for grant-related activity. These funds must be accounted for as the grant budget details. Electronic reporting to the DOJ/BJA of the expended funds is required on a quarterly basis and done by the Administrative Division.

19.5. INTER-ACCOUNT BANK TRANSFERS:

The Administrative Division monitors the balances in the bank accounts to determine when there is a shortage or excess in the checking account. The Administrative Division recommends to the Executive Director when an amount of funds greater than \$50,000.00 or an out of the ordinary transfer of funds is required. The Administrative Division is directed in writing when to make a transfer and in what amount.

19.6. CASH DISBURSEMENTS AND EXPENSE ALLOCATIONS:

- A. Cash disbursements are generally made for:
 - 1. Payments to vendors for goods and services

- 2. Staff training and development
- 3. Meeting expenses
- 4. Employee reimbursements
- 5. Marketing /promotional materials
- B. Checks are processed daily.
- C. Requests for cash disbursements are submitted to Accounting in two ways:
 - 1. Original invoice
 - 2. Employee expense report or reimbursement request
- D. Every employee reimbursement or purchase request must be documented on the approved form with travel authorization, receipts, nature of business, program allocation, and funding source (if applicable) before approving for reimbursement as follows:
 - 1. Lodging -- an itemized receipt from the hotel detailing all charges, the person(s) for whom the lodging was provided, and the specific business purpose.
 - 2. Meals and Entertainment -- a per diem rate is used for food, beverage, and gratuities, including the names of every person for whom food or beverage was provided, and the specific business purpose.
 - 3. Other Expenditures -- a receipt from the vendor detailing all goods or services purchased, including the class of service for transportation, and the specific business purpose.
- E. The Administrative Division reviews all requests for payment and:
 - 1. Verifies expenditure and amount
 - 2. Approves for payment if in accordance with budget
 - 3. Provides or verifies appropriate allocation information
 - 4. Prints checks according to the allocation
 - 5. Submits checks, with attached backup documentation to either the Executive Director or Deputy Director for approval and signature
 - 6. Attaches pay stub to the paid invoice
 - 7. Mails checks and appropriate backup documentation
 - 8. Files all backup documentation in the appropriate file
- F. Expense allocations -- expenses that benefit more than one cost center, e.g., administration, fundraising, and program, etc., are spread across centers using a shared cost method. Under this method, the number of full-time equivalents (FTEs) within a department are divided by the total number of FTEs at the organization to determine the percentage of shared costs they should bear. This is done on an annual basis by the Administrative Division.

19.7. CREDIT CARD POLICY AND CHARGES:

A. All staff members who are authorized to carry an organization credit card will be held personally responsible in the event that any charge is deemed personal or unauthorized. Unauthorized use of the credit card includes: personal expenditures of any kind;

expenditures which have not been properly authorized; meals, entertainment, gifts, or other expenditures which are prohibited by budgets, laws, and regulations, and the entities from which C.O.P.S. receives funds.

- B. The receipts for all credit card charges will be given to the Administrative Division within one (1) week of the purchase along with proper documentation. The Administrative Division will verify all credit card charges with the monthly statements. A copy of all charges will be attached to the monthly credit card statement when submitted to the Executive Director or the Deputy Director for approval and signature.
- C. The Executive Director's credit card usage will be provided to the National Board upon request.

19.8. ACCRUALS:

- A. To ensure a timely close of the General Ledger, C.O.P.S. may book accrual entries. Some accruals will be made as recurring entries.
- B. Accruals to consider:
 - 1. Monthly interest earned on money market accounts, certificates of deposits, etc.
 - 2. Recurring expenses, including employee vacation accrual, prepaid corporate insurance, depreciation, etc.

19.9. BANK ACCOUNT RECONCILIATIONS:

- A. All bank statements received through the online banking systems are printed by the Administrative Division.
- B. The Administrative Division:
 - 1. Reconciles each account as follows: a comparison of dates and amounts of deposits as shown in the accounting system and on the statement, a comparison of interaccount transfers, an investigation of any rejected items, a comparison of cleared checks with the accounting record including amount, payee, and sequential check numbers
 - 2. Verifies that voided checks, if returned, are appropriately defaced and filed
 - 3. Investigates any checks that are outstanding over six months
 - 4. Will attach the completed bank reconciliation to the applicable bank statement, along with all documentation
- C. Upon request, the reconciliation report and associated bank statement, will be reviewed, approved, dated, and initialed by the Executive Director or Deputy Director and Administrative Director.

19.10. PETTY CASH FUND:

A. Petty cash funds are maintained by the Administrative Division. The funds are to be used for miscellaneous or unexpected purchases and the same approval procedures apply as mentioned in the cash disbursement section.

- B. The petty cash fund should not exceed seven hundred dollars (\$700) and is kept in a locked file cabinet at all times.
- C. The Administrative Division oversees the petty cash fund.
- D. All disbursements made from petty cash are acknowledged by a petty cash voucher ticket, signed by the employee receiving the funds and the Administrative Director or the Accountant.
- E. All money returned to the petty cash fund is counted and verified by the Administrative Division and employee returning the funds. Receipts for items purchased with petty cash must be included with the return and should include appropriate account allocations as well as supervisor approval.
- F. The Administrative Director and Accountant will reconcile the petty cash fund monthly.
- G. No checks will be cashed by the petty cash fund.

19.11. PROPERTY AND EQUIPMENT:

- A. Property and equipment include items such as:
 - 1. Office Furniture and Equipment
 - 2. Computer Hardware
 - 3. Computer Software
 - 4. Leasehold Improvements
 - 5. Buildings
- B. It is the organization's policy to capitalize all items which have a unit cost greater than three thousand five hundred dollars (\$3,500) with an estimated life in excess of one year. Items purchased with a value or cost less than three thousand five hundred dollars (\$3,500) will be expensed in the period purchased.
- C. The depreciation period for capitalized assets is as follows:

1.	Computer Hardware	36 months
2.	Office Equipment	60 months
3.	Office Furniture	60 months
4.	Computer Software	36 months
5.	Leasehold Improvements	Length of lease
6.	Buildings	39 years

- D. Depreciation is recorded at least annually. Depreciation is computed using the straightline method over the estimated useful life of the related assets. Any impaired assets discovered during the inventory will be written down to their actual value.
- E. A Fixed Asset Log is maintained by the Administrative Division including date of purchase, asset description, purchase/donation information, cost/fair market value, donor/funding source, identification number, life of asset. The Fixed Asset Log will be reviewed by the Financial Division and the IT Specialist.

- F. Annually, a physical inspection and inventory will be taken of all fixed assets and reconciled to the *General Ledger* balances.
- G. The Administrative Division shall be informed in writing of any change in status or condition of any property or equipment.

19.12. PERSONNEL RECORDS:

- A. All personnel files contain the following documents: an application and/or résumé, date of employment, position and pay rate, authorization of payroll deductions, IRS Form W-4 (Employee's Withholding Allowance Certificate), termination data where applicable, a signed confidentiality agreement, a signed acknowledgement of receipt of Employee Handbook, an emergency contact form, and other forms as deemed appropriate by the Deputy Director or Administrative Director.
- B. All employees will fill out an USCIS Form I-9 and submit the allowable forms of identification to the Administrative Director.
- C. The completed USCIS Form I-9 will be kept in a secure location separate from the personnel files.
- D. All personnel files are to be kept in a secure, locked file cabinet by the Deputy Director and accessed only by authorized personnel.

19.13. PAYROLL PROCESSING:

- A. Timesheets are to be prepared by all staff on the approved form and submitted bi-weekly. They are to be kept on a daily basis and completed in ink unless prepared electronically.
- B. Any corrections to timesheets are to be made by making a single line through the error and writing in the correction. Correction fluid and/or tape are not allowable.
- C. Timesheets are to be signed and dated by the employee and the employee's supervisor for submission to the Deputy Director for review prior to submission to the Administrative Division.
- D. Any changes to the standing information of the payroll register from the prior period including addition of new employees, deletion of employees, or changes in base pay rate must be accompanied by an Employment Information Form and signed by the Executive Director and will be submitted to the payroll company by the Administrative Director before the change can be made.
- E. The Administrative Division will process payroll in a timely manner and record vacation time, holiday hours, sick time, and any other information deemed necessary to properly reflect time worked.
- F. Employees must choose direct deposit to a designated bank account. Their paycheck is deposited directly into the designated account on the payroll date. The employee will receive a verification stub.

- G. The Administrative Division will review payroll expenditures and allocations bi-weekly.
- H. All quarterly federal and state payroll reports are prepared and filed appropriately by the payroll company.
- I. All IRS Form W-2 statements are issued to employees prior to January 31st of the following year by the payroll company.

19.14. END OF MONTH AND FISCAL YEAR-END CLOSE:

- A. The Administrative Division will review, sign and file all monthly and year-end journal entries.
- B. At the end of each month and fiscal year end, the Administrative Division will review all balance sheet accounts including verification of the following balances: cash accounts match the bank reconciliations, fixed assets accounts reflect all purchases, write-downs and retirements, accounts receivable and payable accounts match outstanding amounts due and owed.
- C. The income and expense accounts review will include reconciliation to amounts received and expended and verification that payroll expenses match the payroll reports, including federal and state payroll tax filings.
- D. Once the final month and fiscal year-end financial statements are run, reviewed, and approved by the Administrative Director and Executive Director, no additional entries or adjustments will be allowed for that month or year's ledgers.
- E. At the end of the fiscal year, the outside CPA will prepare the annual Return of Organization Exempt From Income Tax (IRS Form 990). The return will be presented to the Executive Director, the Audit Committee, and the National Board for their review and approval. The Administrative Director will then file the return with the Internal Revenue Service by the annual deadline.
- F. All other appropriate government filings, including those required by the state tax board and Attorney General's office, will be completed and filed with the appropriate agency.

19.15. FINANCIAL REPORTS:

- A. The Administrative Division will prepare quarterly and annual financial reports for distribution. The reports will include: balance sheets, statement of income and expenses, statement of cash flows.
- B. Quarterly and annual financial reports will be submitted to the National Board for review and approval.

19.16. FISCAL POLICY STATEMENTS:

A. All cash accounts, except petty cash, owned by C.O.P.S. will be held in financial institutions which are insured by the FDIC.

- B. All capital expenditures which exceed two thousand five hundred dollars (\$2,500) will be capitalized.
- C. Employee or public personal checks will not be cashed through the petty cash fund.
- D. No salary advances will be made under any circumstances.
- E. Travel cash advances will be made under special conditions and pre-approved by the Executive Director and then only at 75% of the anticipated cost.
- F. Reimbursements will be paid upon complete expense reporting and approval using the official C.O.P.S. form.
- G. The Executive Director, the Deputy Director, the Administrative Director and the Accountant are the signatories on C.O.P.S. bank accounts. All disbursements require two authorized signatures, one being the Executive Director or the Deputy Director.
- H. Bank statements will be reconciled monthly.
- I. Correction fluid and/or tape will never be used in preparing timesheets or any accounting documents.
- J. Accounting and payroll records will be kept in locked file cabinets in the finance office and only parties with financial and/or human resources responsibility will have access to the keys.

Approved SOP 19.0 adopted by the National Board on April 4, 2018.

Approved SOP 19.0 changes from Director of Ops to Deputy Director and Financial Manager/Department to Administrative Director/Department by National Board vote (Control # 0156-02) June 22, 2020

20.0. <u>KIDS COUNSELING REIMBURSEMENT PROGRAM - COUNSELING</u> <u>CHILDREN AND YOUTH (C.O.P.S.) KIDS</u>

20.1. SCOPE:

This Standard Operating Procedure (SOP) establishes guidelines for the Concerns of Police Survivors (C.O.P.S.) Counseling for Children and Youth (C.O.P.S. Kids).

20.2. OBJECTIVE:

To provide guidelines for submitting an application for assistance of fees associated with "out-of-pocket" costs to the parent/legal guardian for the counseling services provided for the dependent child as defined in paragraph 20.3 A or adult child as defined in paragraph 20.3 C.

20.3. ELIGIBILITY:

- A. Any dependent child of a law enforcement officer who died in the line of duty according to C.O.P.S. membership guidelines is eligible for this program.
- B. Eligibility for financial assistance with counseling expenses ceases with the child's 22nd birthday.
- C. Age Waiver Request: Adult Children may request an age waiver in writing to the C.O.P.S. National Board, to support the providing of, or the continuation of counseling services past the current SOP restriction of the 22nd birthday. The C.O.P.S. National Board's decision is final.
- D. The surviving parent may also be eligible for counseling reimbursement if the counseling received is in direct relation to a prescribed treatment plan for the child or is a family counseling treatment session held in conjunction with the child.
- E. If the officer's death is pending approval by PSOB, FOP, FBI, or NLEOMF as a LODD, the Executive Director can determine eligibility.

20.4. PROCESS:

- A. C.O.P.S. Staff will determine eligibility of all related documents.
- B. The C.O.P.S. Staff will notify the licensed counselor/practitioner listed on the application of the possible out of pocket financial assistance provided by C.O.P.S. and request the following information:
 - 1. Copy of state license, certification of degree in field of practice.
 - 2. Proof of malpractice insurance, if applicable.
 - 3. Completed and signed IRS Form W-9.
 - 4. Payment process and documentation of billing.

- C. The C.O.P.S. Staff will determine the amount owed for payment or for reimbursement for the out-of-pocket expenses with an Explanation of Benefits from the insurance provider or a receipt from the mental health provider showing the amount paid.
- D. C.O.P.S. Staff will issue payment.
- E. The C.O.P.S. Staff will record payment amounts only in the database under the counseling tab on the child's record. All other records regarding the counseling will be maintained in strict confidence in accordance with SOP 15.0.
- F. Appeal Process: If C.O.P.S. Staff determines the request does not fit within the scope of the counseling program, the applicant will be notified. The applicant may appeal the decision to the C.O.P.S. National Board. The C.O.P.S. National Board's decision is final.

20.5. APPLYING:

- A. An application must be completed and submitted to the C.O.P.S. National Office for each dependent aged child to which financial assistance is being requested, along with a copy of the child's birth certificate, proof of health insurance, and invoice.
- B. Incomplete applications will be held for 90 days. C.O.P.S. staff will make every effort to receive all required documentation during the 90 period. After that period, the application will be voided, and a new application must be submitted.
- C. Payments will not be made more than 180 days from the clinician visit.

20.6. MONETARY LIMITATIONS PER CHILD:

- A. There is a \$6,000 lifetime limit on counseling assistance per each eligible child.
- B. There is a \$500 per year limit on prescribed psychological medication. Medication payments per year count towards the \$6,000 lifetime limit for the child.
- C. There is a \$4,000 lifetime limit on family/group/parenting classes.

20.7. REAPPLYING FOR ADDITIONAL ASSISTANCE:

- A. The parent/legal guardian for the dependent child as defined in paragraph 20.3 A above or adult child as defined in paragraph 20.3 C above may apply for additional assistance by writing a letter to the C.O.P.S. National Board asking for additional "C.O.P.S. Kids" counseling assistance.
- B. Additional financial assistance will be given consideration by the C.O.P.S. National Board on a case-by-case basis if surplus funds exist in the "C.O.P.S. Kids" account.

20.8. CONFIDENTIAL, PRIVILEGED INFORMATION:

All information submitted to C.O.P.S. in conjunction with the "C.O.P.S. Kids" program will be treated as confidential and privileged information. Family surnames and names of children will never be included in any printed report that leaves the C.O.P.S. National Office.

Approved by the National Board on January 31,2021 Revised and Approved by National Board vote on January 25, 2025

21.0. HOW AN SOP OR A BYLAWS ARTICLE IS ADOPTED OR AMENDED

21.1. SCOPE AND OBJECTIVE:

- A. This Standard Operating Procedure (SOP) establishes guidelines and policy for preparing or amending a National SOP, National Bylaws Article(s), Chapter SOP and/or Chapter Bylaws Article(s).
- B. Hereinafter, all references to the Bylaws Committee, the Bylaws Committee Chair or the Board infers the National Bylaws Committee, the National Bylaws Committee Chair or the National Board, unless otherwise noted.

21.2. THE PROCESS (NATIONAL BYLAWS AND NATIONAL SOPS):

- A. Step 1: A requirement for a new or amended National SOP or an Article of the National Bylaws is identified by an individual, group or chapter.
- B. Step 2: The requirement must be in written form and in proposed language and format appropriate for preparing a Bylaws Article or SOP and is passed from:
 - 1. A National Board member to the Bylaws Committee Chair, or
 - 2. An individual, group or chapter to the National Chapter Liaison (NCL) to the Bylaws Committee Chair, or
 - 3. A National Office staff member to the C.O.P.S. Executive Director to the Bylaws Committee Chair.
- C. Step 3: Bylaws Committee Chair reviews the submission, makes preliminary changes if necessary, and forwards to the Bylaws Committee members for review, comments, changes, etc.
- D. Step 4: Bylaws Committee Chair submits the document to the National President for inclusion in the agenda for the National Board meeting, either via conference call or face to face meeting.
- E. Step 5: Bylaws Committee Chair presents the document to the National Board via conference call, email, or face-to-face meeting.
- F. Step 6: The Board reviews, comments, makes changes, approves, disapproves, returns for further action to the Bylaws Committee Chair with instructions as to what needs to happen in order to resubmit to the Board, etc.
- G. Step 7: If approved by the Board, other actions are necessary:
 - 1. If the Article or SOP directly affects chapter operations, the Board will instruct the Bylaws Committee Chair to have the document sent to the chapters for comment via the NCL.
 - a. If an Article or SOP requires chapter comments, the NCL will forward the document to the chapters with a deadline date for comments to be returned to the NCL or the Bylaws Committee Chair. This action provides the chapter the opportunity to comment on the proposed Article and/or SOP. If no comments

- are received from a chapter, it will be *assumed* that there is *no objection* to the proposed Article or SOP for the chapter.
- b. Once input is received by the Bylaws Committee Chair from the NCL and the chapters, the comments will be reviewed and considered for incorporation in the proposed Article or SOP. If there is substantive change to the proposed Article or SOP, the comments will be referred again to the Bylaws Committee members for comment. When comments are incorporated in the document, the Article or SOP will be prepared in final draft and sent to the National President for Board review and vote. Any Board comments are considered when the Bylaws Committee Chair prepares the final document for publication.
- 2. If no direct effect on chapter operations, the Board can approve the Article or SOP proposal at the Board meeting with any changes directed by the Board if they are necessary.
- H. Step 8: If the Article or SOP receives Board approval, the Article or SOP is checked for format and administrative issues and forwarded to the National Office Executive Assistant for insertion in the Master copy of the Bylaws and National SOPs. In case of changes to the template of the Chapter Bylaws, the NCL will forward changes to each chapter for their incorporation in their respective governing documents.

21.3. CHAPTER SOPS:

- A. In accordance with Chapter Bylaws, Section 3, Article XIII, "The Chapter shall, under no circumstances, have the power or authority to amend or repeal the Articles of Incorporation of the Chapter, the Articles of Affiliation, or the National SOP 3.0. Said power lies solely with the National Board. If the Chapter is requesting a change to the National SOP 3.0, that change shall be proposed to the National Office who shall refer it to the National Bylaws/SOP Committee."
- **B.** In accordance with Chapter Bylaws, Section 4, Article XIII, "The Chapter may develop and/or amend their own SOPs. Chapter SOPs shall be developed and approved by the Board and shall be shared with the Chapter membership. At no time will a Chapter SOP be in conflict with a National SOP. At all times, the National SOP shall prevail. A copy of the SOP shall be forwarded to the National Office for filing." (NOTE: the Board referred to in this paragraph is the Chapter Board, not the National Board.)
- **C.** The Bylaws Committee is available to review and/or assist a chapter in preparing a chapter's SOP.

21.4. CHAPTER BYLAWS:

- A. Amendments to Chapter Bylaws shall follow the procedures stated in Section 2, Article XIII of the Chapter Bylaws.
- B. There may be an occasion that the National Board will deem it necessary to amend Chapter Bylaws. If that is the case, the procedures outlined in paragraph 2.0 of this SOP shall be followed.

SOP 21.0 Voted on by the National Board on December 12, 2018

22.0. C.O.P.S. CODE OF CONDUCT

22.1. SCOPE:

The Concerns of Police Survivors (C.O.P.S.) Code of Conduct defines acceptable behavior and social norms that individuals in the C.O.P.S. organization shall adopt on a day-to-day basis. It reflects the Mission, Vision, and Core Values of the C.O.P.S. organization found in National and Chapter Bylaws and the overall culture of the C.O.P.S. organization.

22.2. OBJECTIVE:

The purpose of this code of conduct is to set and maintain a standard for acceptable behavior to all members of the C.O.P.S. organization. It serves to remind all members of what is expected from them. It also provides an explanation of consequences and disciplinary actions if the conduct is broken.

22.3. GENERAL GUIDELINES:

- A. C.O.P.S. activities, events and programs:
 - Clear communications and clearly defined limits promote acceptable behavior. The C.O.P.S. National Office Staff and the National Board have developed guidelines for conduct during C.O.P.S. activities and events, including Weekends and Camps. In all cases, these guidelines will be appropriate to the age level and maturity level of the participant.
 - 2. While attending any C.O.P.S. event or activity, participants are required to follow the rules and regulations imposed by the activity/event site management. The activity/event site's rules and regulations will be adopted by C.O.P.S. while at the activity site unless otherwise stated.
 - 3. C.O.P.S. core values stress respect for others and the rights of others, among them the right to an environment which facilitates support, safety, healing, and fun. Participants whose disruptive behavior deprives others of these rights will be subject to disciplinary action.
 - 4. Attendees at C.O.P.S. events and activities, in particular weekends and camps, are vulnerable and attend the events and activities with healing in mind. With any event, C.O.P.S. strongly discourages sexual encounters between attendees at the event outside an already established romantic relationship.
 - 5. When the participant is a minor, his/her parent/guardian will be expected to assist in corrective actions and any actions taken will also affect the parent or guardian.
- B. The following conduct will not be tolerated at any C.O.P.S. event/activity:
 - 1. Offensive Language/Behavior/Communication: Behavior and communication encompassing profanity, abusive, sexual language and obscene gestures is unacceptable. This includes verbal, nonverbal, written and conversations via email, text, social media and phone while at the C.O.P.S. event and directly following the C.O.P.S. event during return travel.
 - 2. Disrespectful Actions: Disrespectful actions of any kind towards C.O.P.S. National Office Staff, counselors, contractors, mentors, volunteers, activity site staff or fellow

- survivors will not be tolerated. These actions, including but not limited to, behavior that is rude, unpleasant, inappropriate, physical, offensive, and unprofessional.
- 3. Fighting: C.O.P.S. will not tolerate physical violence of any kind at any C.O.P.S. event between any C.O.P.S. National Office Staff, counselors, mentors, volunteers, activity site staff and/or participants. These actions, including, but not limited to, behavior that involves pushing, punching, kicking, slapping, spitting and any other physical violence.
- 4. Vandalism: Damage or destruction of any property belonging to C.O.P.S., C.O.P.S. National Office Staff, counselors, contractors, mentors, volunteers, activity site staff, participants or the activity site will not be tolerated and is punishable by payment of damages and/or legal prosecution.
- 5. Stealing: Stealing will not be tolerated. Theft includes, but is not limited to, stealing activity site property, C.O.P.S. property, stealing from C.O.P.S. National Office Staff, counselors, contractors, mentors, activity site, and activity site staff or from other participants. Stolen or lost property should be reported to C.O.P.S. National Office Staff, counselors, contractors, mentors, volunteers, immediately.
- 6. Prohibited Items:
 - a. Firearms: Firearms are prohibited at C.O.P.S. events; however, if a participant is a sworn or retired law enforcement officer, he/she may bring a firearm, but is required to inform the C.O.P.S. National Office Staff and have the proper identification. Attendee is required to keep his/her firearm in a lock-box when the firearm is not on his/her person at the activity site.
 - b. Explosives: Explosives being defined as a substance which can be made to explode, including fireworks.
 - c. Knives: If a supervised program requires a knife, the participant will be notified in advance, and the knife will be provided for him/her.
 - d. Illegal Drugs or Narcotics: This includes prescription drugs in the participant's possession not prescribed for him/her.
 - e. Alcoholic Beverages:
 - (1) Any alcoholic beverage that is not provided at the event/activity venue will be considered a prohibited alcoholic beverage.
 - (2) Alcohol for medicinal purposes that is prescribed by a medical professional must be pre-approved by the National Office.
 - (3) C.O.P.S. reserves the rights to hold any prohibited beverage discovered at the property site; this beverage will be returned to the participant before he/she depart the activity site.
 - (4) C.O.P.S. reserves the right to ask anyone bringing prohibited alcoholic beverages to leave the event, activity or program.
 - f. Other Dangerous Articles: This includes anything that C.O.P.S. National Board or National Office Staff deems dangerous that is not listed above.
- 7. Overconsumption of Alcoholic Beverages:
 - a. Overconsumption of alcoholic beverages, prohibited or not, is unacceptable and will be viewed as a violation of the Code of Conduct.
 - b. C.O.P.S. National Office Staff has the right to limit and/or cease consumption of alcoholic beverages for one or all at a C.O.P.S. event, activity or program attendee(s).
- 8. Extortion: Threatening other participants or extorting money or property is prohibited.

9. Gambling: Playing cards, flipping or matching coins, rolling dice for money or any form of gambling is prohibited. National Office Staff may confiscate any money or material.

C. Harassment/Bullying:

1. Definitions:

- a. Conduct, such as, but not limited to, actions, words or images, as well as other forms of communication that is based on an individual's personal characteristics, such as race, color, religion, age, gender, national origin or ancestry, marital status, military/veteran status, or status as a qualified individual with a disability which is unwelcome, offensive, severe or persistent enough to unreasonably interfere with an individual's work performance or activities. Harassment can also result in lower satisfaction and productivity and create an uncomfortable environment. C.O.P.S. will not tolerate harassment and will take positive steps to stop it.
- b. Gender based harassment: Sexually-oriented "kidding" or jokes, physical contact such as patting, pinching, or purposely rubbing up against another's body, demands for sexual favors tied to promises of better treatment or threats for refusal, discriminating against a survivor who refuses to provide sexual favors, or granting benefits to a survivor who provides sexual favors. Gender harassment can also occur when an individual is the target of unwelcome and offensive jokes, cartoons, posters, gestures, comments, emails, texts, or other forms of communication that demean an individual due to gender.
- c. Bullying: Repeated inappropriate behavior, either direct or indirect, whether verbal, written, physical or otherwise, conducted by one or more persons against another or others. Bullying may be intentional or unintentional. C.O.P.S. will not tolerate bullying and will take positive steps to stop it.
 - (1) The following types of behaviors are considered examples of bullying:
 - (a) Verbal or Written Communication Bullying: slandering, ridiculing or maligning a person or his/her family; persistent name calling, which is hurtful, insulting or humiliating; using a person as butt of jokes; abusive and offensive remarks.
 - (b) Physical Bullying: pushing; shoving; kicking; poking; tripping; assault, or threat of physical assault; damage to a person's work area or property.
 - (c) Gesture Bullying: non-verbal threatening gestures, glances which can convey threatening messages.
 - (d) Exclusion: socially or physically excluding or disregarding a person in C.O.P.S. related activities.
 - (2) The following examples may constitute or contribute to evidence of bullying:
 - (a) Persistent singling out of one person
 - (b) Shouting, raising voice at an individual in public and/or in private
 - (c) Using verbal or obscene gestures
 - (d) Not allowing the person to speak or express him/herself (i.e., ignoring or interrupting)
 - (e) Personal insults and use of offensive nicknames
 - (f) Public humiliations in any form

- (g) Constant criticism
- (h) Ignoring/interrupting an individual in meetings
- (i) Public reprimands
- (j) Repeatedly accusing someone of errors which cannot be documented
- (k) Deliberately interfering with mail and other communications
- (l) Spreading rumors and gossip regarding individuals
- (m) Manipulating the ability of someone to do their work (e.g., overloading, under-loading, withholding information, setting meaningless tasks, setting deadlines that cannot be met, giving deliberately ambiguous instructions)
- (n) Taking credit for another person's ideas
- (o) Deliberately excluding an individual or isolating them from C.O.P.S. related activities, e.g., meetings, etc.
- (p) Unwanted physical contact, physical abuse or threats of abuse to an individual

2. Responsibilities and/or Requirements:

a. Survivors:

- (1) Are prohibited from harassing other survivors regardless of whether the incidents of harassment/bullying occur on or off the organization's premises and regardless of whether the incidents occur during C.O.P.S. activities.
- (2) In instances in which an individual thinks another survivor is harassing/bullying him/her, and it is possible or practical, inform that person that such behavior is offensive and against C.O.P.S. policy, ask the person to immediately stop the behavior and contact your Region Trustee or the Chair of the National Grievance Committee or the National Executive Director.
- (3) If informed by another survivor that your behavior is offensive, stop the behavior in question.
- (4) Contact your Region Trustee or Chair of the Grievance Committee if a non-survivor harasses/bullies you.
- (5) Who know of a leader abusing his/her position by condoning, participating in, or initiating harassment shall inform a higher-level member of C.O.P.S. leadership so that C.O.P.S. can take appropriate corrective action.
- b. Leaders (includes National and Chapter Boards and Officers, and any individual placed in a leadership position at the National or Chapter level):
 - (1) Are prohibited from disciplining or otherwise retaliating against survivors for reporting an alleged incident of harassment/bullying or for survivors participating in an investigation or a report of harassment/bullying.
 - (2) Upon being told of possible harassment/bullying, are expected to take prompt, effective action to determine whether harassment/bullying has occurred or is taking place, and to stop such behavior where it does exist.
 - (3) May not be able to control the offensive behavior of all non-survivors but will work to remedy/mitigate the situation. If needed, contact Region

- Trustee or Chair of the National Grievance Committee or the National Executive Director/file a grievance/seek mediation.
- (4) Are to submit an official grievance, including statements from the witnesses involved and any other relevant documentation.
- (5) Will be subject to corrective action, up to and including, implementation of the recommendations of the Grievance Committee, outcome from the National Board that are found to condone, participate, or initiate any type of harassment or bullying.

22.4. DISCIPLINE:

- A. Participants who willfully violate the Code of Conduct face a variety of consequences determined by the severity of the offense. Actions taken may include, but are not limited to, warning, reprimand, ban from participation in program/event activities, payment for damages and expulsion from the C.O.P.S. event, activity, or program, and are subject to a grievance being filed against them.
- B. C.O.P.S. reserves the right to treat any violation to the Code of Conduct on a case by case basis. Generally, the following guidelines will be used, but the decision may be made to accelerate the discipline criteria depending on the severity of the offense.
- C. Violations of the Code of Conduct are treated as serious offenses and the following actions may be taken:

1. First offense:

- a. The participant and/or his/her parent/guardian will be given notice of the offense and a warning. If a parent/guardian is accompanying the participant, the parent/guardian is expected to take corrective action.
- b. Continued misbehavior by the participant can result in suspension of the right to activities of a time to be determined by the appropriate C.O.P.S. National Office Staff and/or parent/guardian.
- c. If no visible improvement of behavior is shown, then the participant may be expelled.

2. Second offense:

- a. The participant can be denied activity privileges for a time to be determined by C.O.P.S. National Office Staff.
- b. Continued misconduct may result in the participant's and/or parent/guardian and/or other siblings and/or any family member's expulsion from the C.O.P.S. event or program. Should a participant be expelled from the C.O.P.S. event or program, they (the participant and in some cases this may involve the parent/guardian and other siblings) will be responsible for scheduling their own transportation and lodging back to their point of origin immediately.

3. Expulsion:

a. C.O.P.S. National Office Staff, upon consultation with the National Board, other C.O.P.S. staff, counselors, mentors and volunteers, as applicable, after deliberation, have the right to expel a participant pursuant to the criteria listed below which has been approved by the National Board.

- b. If expulsion of a participant involves a parent/guardian or siblings, the aforementioned group forfeits their right to participate in the C.O.P.S. event or program and must leave the activity site immediately.
- c. Any cost involved with the expulsion will be borne by the dismissed participant(s) and/or dismissed family.
- d. The criteria for expulsion are as follows:
 - (1) Physical assault on another participant, C.O.P.S. National Office Staff, counselors, contractors, mentors, or volunteers.
 - (2) Sexual harassment to another participant, C.O.P.S. National Office Staff, counselors, contractors, mentors, or volunteers.
 - (3) Carrying a weapon not approved by a supervised program.
 - (4) Illegal possession and/or illegal consumption of alcohol, controlled dangerous substances, drug paraphernalia or being under the influence of such substance while on activity/event premises.
 - (5) Conduct constituting a danger to the physical/mental well-being of other participants, C.O.P.S. National Office Staff, counselors, contractors, mentors, or volunteers.
 - (6) Continued and willful disobedience or open defiance of any authority figure employed or volunteering for C.O.P.S.
 - (7) Stealing of another participant or staff members' personal property, whether by theft, through force or by intimidation.
 - (8) Refusal to take prescribed medications.
 - (9) Habitual use of profanity or obscenities/gestures.
 - (10) Willfully causing damage to activity area property.
 - (11) Continued overconsumption of alcoholic beverages.
- e. Any survivor who is expelled from a C.O.P.S. event or program shall have to submit a formal request to the C.O.P.S. National Board to be considered to attend a C.O.P.S. event/activity/program in the future.

Approved by the National Board January 31, 2021 Amended by the National Board July 24, 2025

23.0. DATA BREACH POLICY

23.1. INTRODUCTION:

- A. Concerns of Police Survivors (C.O.P.S.) collects, holds, processes, and shares personal data, a valuable asset that needs to be suitably protected.
- B. Every care is taken to protect personal data from incidents, either accidentally or deliberately, to avoid a data protection breach that could compromise security.
- C. Compromise of information, confidentiality, integrity, or availability may result in harm to the individual(s), reputational damage, detrimental effect on service provision, legislative non-compliance, and/or financial costs.

23.2. PURPOSE AND SCOPE:

- A. A. C.O.P.S. is obliged under data protection legislation to have in place an institutional framework designed to ensure the security of all personal data during its lifecycle, including clear lines of responsibility. This policy:
 - 1. Sets out the procedure to be followed to ensure a consistent and effective approach is in place for managing data breach and information security incidents across C.O.P.S. and, when required by law, notify persons whose personal data has been unlawfully obtained, as well as state and/or federal authorities;
 - 2. Relates to all personal and special categories (sensitive) data held by C.O.P.S. regardless of format;
 - 3. Applies to the National Board and the C.O.P.S. National Office Staff members. This includes temporary, casual or agency staff and contractors, consultants, suppliers, and data processors working for, or on behalf of C.O.P.S.
- B. This policy's objective is to contain any breaches, minimize the risk associated with the breach, notify data subjects and government authorities when required, and consider what action is necessary to secure personal data and prevent further breaches.

23.3. DEFINITIONS/TYPES OF BREACH:

- A. For this policy, data security breaches include both confirmed and suspected incidents.
- B. An incident in the context of this policy is an event or action which may compromise the confidentiality, integrity, or availability of systems or data, either accidentally or deliberately, and has caused or has the potential to cause damage to C.O.P.S. information assets and/or reputation.
- C. An incident includes but is not restricted to the following:
 - 1. Loss or theft of confidential or sensitive data or equipment on which such data is stored, e.g., loss of a laptop, USB stick, IPad/tablet device, or paper record;
 - 2. Equipment theft or failure;

- 3. System failure;
- 4. Unauthorized use of, access to, or modification of data or information systems;
- 5. Attempts (failed or successful) to gain unauthorized access to information or IT system(s);
- 6. Unauthorized disclosure of sensitive/confidential data;
- 7. Website defacement;
- 8. Hacking attack;
- 9. Unforeseen circumstances such as a fire or flood;
- 10. Human error
- 11. Offenses where information is obtained by deceiving the organization who holds it.
- D. Personal Data Definition: An individual's first name or first initial and last name in combination with any one or more of the following data elements, when either the name or the data elements are not encrypted (meaning rendered unusable, unreadable, or indecipherable to an unauthorized person through a security technology or methodology generally accepted in the field of information security):
- Social Security number;
- Driver's license number or state identification card number, tax identification number, passport number, military identification number, or other unique identification number issued on a government document commonly used to verify the identity of a specific individual;
- Account number, credit card number or debit card number in combination with any required security code, access code, or password that would permit access to an individual's financial account;
- Medical information (any information regarding an individual's medical history, mental or physical condition, or medical treatment or diagnosis by a health care professional);
- Health insurance information (an individual's health insurance policy number or subscriber identification number, any unique identifier used by a health insurer to identify the individual, or any information in an individual's application and claims history, including any appeals records).
- E. Personal Data also includes user name or email address, in combination with a password or security question and answer that would permit access to an online account. Personal Data does not include publicly available information that is lawfully made available to the general public from federal, state, or local government records.

23.4. REPORTING AN INCIDENT INTERNALLY:

- A. Any individual who accesses, uses or manages C.O.P.S. information is responsible for reporting data breach and information security incidents immediately to the Executive Director and IT Specialist.
- B. If the breach occurs or is discovered outside normal working hours, it must be reported as soon as practicable.
- C. The report should include full and accurate details of the incident, when the breach occurred (dates and times), who is reporting the breach, if the data relates to people, the

- specific type of data, how many individuals are involved, and where those data subjects reside.
- D. All staff should be aware that any breach of data may result in C.O.P.S. disciplinary procedures being initiated.

23.5. CONTAINMENT AND RECOVERY:

- A. The IT Specialist will first determine if the breach is still occurring. If so, the appropriate steps will be taken immediately to minimize the effect of the breach.
- B. An initial assessment will be made to establish the severity of the breach and who will take the lead investigating the breach.
- C. A Lead Investigator, specializing in data breach investigation and mitigation will be hired as a consultant by the Executive Director. The C.O.P.S. staff will cooperate fully with the investigation and will assist the Lead Investigator as requested.
- D. The Lead Investigator will establish whether anything can be done to recover any losses and limit the damage the breach could cause.
- E. The Lead Investigator will work with the Executive Director to establish who may need to be notified as part of the initial containment and will inform the police, where appropriate.
- F. Advice from additional experts may be sought in resolving the incident promptly.
- G. The Lead Investigator and the Executive Director will work together to determine the suitable course of action to be taken to ensure a resolution to the incident.

23.6. INVESTIGATION AND RISK ASSESSMENT:

- A. After the data breach is contained, an investigation will be undertaken by the Lead Investigator.
- B. The Lead Investigator will assess the risks associated with the breach, for example, the potential adverse consequences for individuals, how serious or substantial those are, and how likely they are to occur.
- C. The investigation will need to take into account the following:
 - 1. The type of data involved;
 - 2. Its sensitivity;
 - 3. The protections are in place (e.g., encryptions);
 - 4. What has happened to the data (e.g., has it been lost or stolen);
 - 5. Whether the data could be put to any illegal or inappropriate use;
 - 6. Data subject(s) affected by the breach, the number of individuals involved and the potential effects on those data subject(s);
 - 7. Whether there are wider consequences to breach.

23.7. NOTIFICATION:

- A. In consultation with relevant colleagues, the Lead Investigator will establish whether notification of the breach is required according to applicable laws and guidance. Those individuals or organizations whose data has been compromised will be notified of the breach, within 72 hours of becoming aware of the breach, where required.
- B. Every incident will be assessed on a case by case basis; however, the following will need to be considered in making the decision to notify:
 - 1. Whether the breach is likely to result in a high risk of adversely affecting individuals' rights and freedoms under Data Protection legislation;
 - 2. Whether notification would assist the individual(s) affected, e.g., could they act on the information to mitigate risks;
 - 3. Whether notification would help prevent the unauthorized or unlawful use of personal data;
 - 4. Whether there are any legal notification requirements under state law(s).
- C. Individuals whose personal data has been affected by the incident, creating a high risk of adversely affecting that individual's rights and freedoms, will be informed without undue delay and, in all instances, within time frames established by applicable law. Notification will include a description of how and when the breach occurred and the data involved. They will be told what action has already been taken to mitigate the risks. Individuals will also be provided with a way to contact C.O.P.S. for further information or ask questions on what has occurred.
- D. The Lead Investigator, together with the Executive Director, must consider notifying third parties such as the police, insurers, banks or credit card companies, and trade unions. This would be appropriate where illegal activity is known or is believed to have occurred, or where there is a risk that illegal activity might occur in the future. In addition, it must be determined whether notification must be provided to a state attorney general or similar authority required by law.
- E. The Executive Director will consider whether C.O.P.S. Communications Department should be informed regarding a press release and ready to handle any incoming press inquiries.
- F. A record will be kept of any personal data breach, regardless of whether notification was required.

23.8. EVALUATION AND RESPONSE:

- A. Once the initial incident is contained, the Lead Investigator will carry out a full review of the causes of the breach; the effectiveness of the response(s), and whether any changes to systems, policies, and procedures should be undertaken.
- B. Existing controls will be reviewed to determine their adequacy and whether any corrective action should be taken to minimize similar incidents.

C. The review will consider:

- 1. Where and how personal data is held and where and how it is stored;
- 2. Where the most significant risks lie, including identifying potential weak points within existing security measures;
- 3. Whether methods of transmission are secure; sharing minimum amount of data necessary;
- 4. Staff awareness;
- 5. If deemed necessary, a report recommending any changes to systems, policies, and procedures will be considered by C.O.P.S.

23.9. POLICY REVIEWS:

This policy will be updated as necessary to reflect best practices and to ensure compliance with any changes or amendments to relevant legislation.

Approved by the National Board May 5, 2021

24.0. EXECUTIVE DIRECTOR PERFORMANCE EVALUATION

24.1. SCOPE:

This Standard Operating Procedure (SOP) establishes guidelines for the annual Executive Director's (ED) performance evaluation.

24.2. OBJECTIVE:

To assure that all Concerns of Police Survivors (C.O.P.S.) National Board members are given an opportunity to be involved and complete an established performance evaluation to assess the Executive Director.

24.3. EXECUTIVE DIRECTOR PERFORMANCE EVALUATION PROCESS

- A. Leading and facilitating the Executive Director Performance Evaluation process:
 - 1. The Performance Evaluation Committee (PEC) is assigned by the National C.O.P.S. President and tasked with evaluating the performance of the Executive Director. The Chair of the Trustees leads the process. If the Chair or any other committee member is unable to serve, the position(s) shall be appointed by the National President and approved by the majority of the National Board in accordance with the Bylaws.

Committee Members include:

- a. President of National C.O.P.S.
- b. Chair of Trustees
- c. Previous Chair of the Trustees
- d. Two Board members with 2 years consecutive Board time on current National Board
- 2. Responsibilities of PEC Committee Members:
 - a. Shall maintain an objective, neutral and professional demeanor during the evaluation process.
 - b. Shall adhere to a strict confidentiality policy regarding all information contained in all written reports, interviews, and discussions.
 - c. Shall report issues that arise to the PEC.
 - d. Shall review and investigate all factual data provided.
 - e. Shall be available to the Board to discuss the PEC's recommendations and reports.
- B. Scheduling the Executive Director performance evaluation:

The evaluation will cover a one-year period starting on January 1st and ending on December 31st. The evaluation process will be completed by January 31st of the following year.

C. Background materials:

To ensure a clear understanding of the criteria; the ED job description, the vision and mission of C.O.P.S., the annual goals and objectives, and the strategic plan will be included with the evaluation.

D. Evaluation tool:

Distribute the evaluation tool and job description to all board members, and Executive Director. Evaluation must be returned to Chair of the Trustees.

E. Collection of data and analysis:

The Chair of the Trustees gathers the evaluation data and presents to the National Board. The evaluation is used to determine compensation and/or increase of benefits in reference to committee findings.

F. Presenting the performance evaluation:

An in person meeting with the Executive Director, President of C.O.P.S., and the Chair of the Trustees is scheduled within 30 days of the evaluation being completed. The discussion of key findings, developed plans and periodic or quarterly review are noted. One (1) copy of the document to Executive Director; One (1) copy to be kept in an electronic secure application managed by National President and Chair of the Trustees.

G. Disposal of Review Forms:

All used materials must be shredded, deleted or disposed of following the meeting with the Executive Director.

Approved by the National Board January 28, 2023