



Parish and School Financial Operations

The Roman Catholic Archdiocese of Washington

Parish Accounting Manual **Section IIIB Electronic Giving Policy for Electronic Giving**

Introduction and Purpose

Parishes use electronic giving to collect payments by credit card or bank account direct debit at the parish website or via mobile device. Electronic giving platforms are similar to bank accounts in that they receive and disburse parish funds. The purpose of this policy is to mitigate the risks associated with electronic giving.

Scope

This policy is applicable to all canonically established parishes and missions of the archdiocese.

Policy Statement

Parishes shall set up electronic giving systems in the name of the parish using the parish's Federal Employer Identification number. The designated account owner shall be the pastor or other clergy and not a lay staff person or volunteer.

Parishes shall segregate the duties of access to electronic giving funds from the duties of recording revenue in the parish accounting and contribution records.

Parishes shall deposit electronic giving funds intact in the parish bank account without making disbursements or other transfers from the electronic giving platform.

Parishes shall respect any restriction by a donor as to the purpose for and/or timing of use of their donation.

Related Documents

[Assessments and National Collections Policy](#)

Policy Compliance

- Compliance measurement: the Executive Director of Parish and School Financial Operations or her delegate may review the procedures and financial records of a parish to determine compliance with the policy.
- Non-compliance: a parish in non-compliance shall be responsible to modify its procedures to become compliant. The Pastor shall write a letter to the Moderator of the Curia describing the parish plans for becoming compliant.

Parish Accounting Manual
Section IIIB Electronic Giving
Guideline for Mobile Payment Platforms

Mobile Payment Platforms

Parishioners and donors may prefer to use the mobile payment platform of their own choice vs. using the parish's electronic giving vendor. For example, individuals who use Venmo, CashApp or Zelle in their daily transactions with friends find it convenient to use those platforms to make charitable donations. This preference is an opportunity for the parish to consider registering as a user on mobile payment platforms.

Because the marketplace offerings of mobile payment platforms change so quickly, this guideline focuses on the key controls a parish should have in place for any electronic giving or mobile payment platform it considers using.

Key Controls

Vendor Selection

- **Features and popularity** the parish should research which mobile payment platforms have features desired by the parish as well as the platforms that are popular with the parish's donors. Individuals with international phones or international bank accounts may not be able to use US-based mobile payment platforms.
- **Nonprofit pricing** the parish should research/request discounted pricing available to non-profit organizations. Generally, processing fees below 3% are considered discounted.
- **Contract review** the parish should make use of the legal expertise of the Archdiocese Office of General Counsel and request Legal review of contracts prior to parish signature.

Account Set-Up

- **Designation of account holder** the parish should use its own name and Federal Employer Identification number to open a business or nonprofit account on the platform. However, the parish may have to designate one individual as the account holder and provide that individual's name, birthdate and social security number. For business continuity and proper stewardship, this should be pastor or other clergy, not a lay staff person or volunteer.
- **Tax-exempt status** the parish can prove its tax-exempt status using the USCCB group tax exemption letter and a copy of the parish's page of The Official Catholic Directory.
- **Parish bank account** the parish will have to tie a bank account to the mobile platform. The parish should not use its main checking account, but rather a small checking or savings account. This control is to prevent processing errors from impacting the main checking account.
- **Parish email address** the parish should utilize an official parish email address – either a parish ADW.org address or an email address on the parish email server – so that the communications are a part of the official record of the parish backed up on the ADW or parish email server.

- **Mobile phone number** the parish may have to provide a mobile phone number to receive notifications from the platform. For business continuity, the parish should not use the mobile number of clergy, staff or volunteers, but rather should obtain a parish mobile number as well as a smart phone that can use apps for parish business use.
- **Recognizable image** to increase donor trust, use a recognizable image of the parish or its logo
- **Donor privacy** be aware that some mobile platforms make public the names and dollar amount of payments processed on the platform; the parish should ensure that privacy settings are used
- **Option for donor to pay processing fees** the parish should consider whether to offer the option for donors to pay the platform processing fees
- **Donor instructions** the parish should consider what instructions on mobile platform use it should provide to potential donors and how the parish will promote use of the platform

System Operations

- **System access** the pastor should ensure that the following controls exist around mobile payment platform system access:
 - Each individual designated by the pastor to access the system should have their own unique logon
 - The pastor should be the only individual who can access the part of the system where the bank account to which receipts are sent can be changed. The parish bookkeeper should not have access to the part of the system where funds can be transferred out of the platform.
 - If the pastor cannot restrict user access as noted above, the pastor should employ alternative internal controls to identify potential unauthorized changes to the account set-up such as: periodic verification of the parish bank account on the platform settings, review of monthly donation activity, identification of any disbursements out of the platform, analytical review of donations month to month, etc.
- **Understanding the donor's intention** many mobile payment platforms use a generic 'comment' field for individuals to specify the purpose of their payment. The parish may have to interpret comments (or even emojis) that are not clear, or guess at the donor's intention if there is no comment. The platform may allow the parish to reply in the platform to the donor to clarify the donor's intent. If through reasonable efforts the parish cannot determine the donor's intent, the parish should presume that the payment is for Sunday offertory.
- **Identity of donor** the mobile payment platform may not provide enough or any information on the identify of the donor. For donor relation purposes, the parish should allocate time to communicate with donors through the platform to determine if the donor would like to share their contact information which can then be added by the parish to the FamilySuite census and contribution system.
- **Sweep receipts off the mobile platform** the parish should make automatic sweeps of cash receipts off of the mobile platform and into the parish bank account. If automatic sweeps are not available, the parish should manually move the funds on a periodic basis, e.g., once per week or more frequently depending on dollar volumes. There may be a dollar limit on the platform as to what can be moved out each day.
- **Disable disbursements** some mobile payment platforms enable disbursements to be made out of the mobile account. E.g., instead of transferring cash receipts to the parish bank account, a user could disburse parish funds to another individual on the mobile platform. The parish should disable this ability or limit the system access for this function. All cash receipts through the platform should be deposited intact in the parish bank account.

Reporting and Accounting

- **Reporting** periodic reporting should be produced from the mobile payment platform to enable:
 - Reconciliation of cash receipts per the mobile platform to cash receipts per the parish bank statement
 - Recording of donations, by individual donor name, to the parish's FamilySuite census and contribution system