

Ministre des Affaires autochtones  
et du développement du Nord



Minister of Aboriginal Affairs and  
Northern Development

Ottawa, Canada K1A 0H4

I, Minister of Aboriginal Affairs and Northern Development, HEREBY  
APPROVE, pursuant to section 83 of the *Indian Act*, the following by-law  
made by the Bigstone Cree Nation, in the Province of Alberta, at a  
meeting held on the 10th day of July 2013.

- **Bigstone Cree Nation Finance By-law**

A handwritten signature in black ink, appearing to read "J. ...".

Dated at Ottawa, Ontario, this *17<sup>th</sup>* day of *November* 2013.

**BIGSTONE CREE NATION  
FINANCE BYLAW**

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**BIGSTONE CREE NATION**  
**A BYLAW GOVERNING THE FINANCES OF THE**  
**BIGSTONE CREE NATION**

**WHEREAS** the Aboriginal and Treaty rights of the Bigstone Cree Nation are recognized and affirmed in Treaty No. 8 entered into between Her Majesty the Queen and the Bigstone Cree Nation and confirmed by section 35 of the *Constitution Act, 1982*;

**AND WHEREAS** Chief and Council have determined that it is in the best interests of the Bigstone Cree Nation to establish a financial management Bylaw to provide for the administration of the Bigstone Cree Nation's financial affairs;

**AND WHEREAS** the Finance Bylaw is an exercise of Aboriginal and Treaty rights and nothing in this Bylaw may be construed as to abrogate or derogate from any Aboriginal and Treaty rights of the Bigstone Cree Nation;

**AND WHEREAS** the *Indian Act*, R.S.C. 1985, c.I-5 further provides in section 83 thereof, that Chief and Council may make laws respecting the financial management of the Bigstone Cree Nation;

**NOW THEREFORE CHIEF AND COUNCIL OF THE BIGSTONE CREE NATION HEREBY ENACTS THE FOLLOWING BYLAW:**

**Part 1**  
**Interpretation**

**1 Short Title**

**1.1** This Bylaw may be cited as the Finance Bylaw.

**2 Definitions**

**2.1** In this Bylaw:

- (a) "Agreement" means any written contract between the Nation and a third party or parties, including any financial arrangements with Her Majesty the Queen in Right of Canada and Her Majesty the Queen in Right of the Province of Alberta, pursuant to which monetary consideration is to be paid to the Nation;

- (b) "Annual Budget" means the forecast of planned revenues and expenditures by the Nation for the forthcoming fiscal year;
- (c) "Asset" or "Assets" means all items of economic value owned by the Nation including cash, securities, accounts receivable, land, mines and minerals, fixtures, houses, buildings, equipment, chattels of any kind, and any item capable of being converted to cash;
- (d) "Capital Asset" means an "Asset" which cannot easily be converted into cash and which is usually held for a long period of time, including real estate and equipment that was purchased for a price exceeding One Thousand (\$1,000.00) Dollars;
- (e) "Council" means the Chief and Council of the Bigstone Cree Nation;
- (f) "Debt" means the total amount of the liabilities or financial obligations of the Nation;
- (g) "Deficit" means the amount by which expenditures exceed revenue in a fiscal year;
- (h) "Director" means the person employed in a department of the Nation to be responsible for the overall administration and financial management of that department;
- (i) "Director of Finance" means the person employed by the Nation to be responsible for the overall financial management of the Nation;
- (j) "Executive Director" means the person employed by the Nation to be responsible for the overall administration of the Nation;
- (k) "Expenditure" means a payment or a promise of a future payment made by the Nation during a fiscal year;
- (l) "Finance Authority" means a Board established by Chief and Council in Part 3 of this Bylaw;
- (m) "Fiscal Year" means an accounting period of 365 days commencing April 1st and ending March 31st of the following year;

- (n) "Immediate Family" means the spouse, common-law spouse, children, parents, siblings, in-laws, grandchildren, grandparents, foster parents, foster children, nephews, nieces, step-children, step-grandchildren, step grand-parents, legal guardian, same sex partners and their children and any person living in the same dwelling;
- (o) "Liabilities" means all outstanding financial obligations, debts, claims, or potential losses of the Nation;
- (p) "Member" means a person whose name appears on the Nation's Membership List in accordance with the Membership laws applicable to the Nation;
- (q) "Nation" means the Bigstone Cree Nation;
- (r) "Nation funds" means all cash or negotiable instruments of the Nation and includes:
  - (i) all revenues and accounts receivable of the Nation,
  - (ii) monies borrowed by the Nation,
  - (iii) monies received or collected on behalf of the Nation,
  - (iv) all monies that are received or collected by the Nation pursuant to any agreement or funding arrangement, and
  - (v) monies received as resource revenues payable into the Nation's trust account by Her Majesty the Queen in Right of Canada or any government department representing Her Majesty;
- (s) "Revenue" means payments received by the Nation from any source.

### **3. Application**

**3.1** This Bylaw applies to the Bigstone Cree Nation.

**Part 2**  
**Responsibilities of Chief and Council**

**4. Final Authority**

- 4.1 Council has the final authority and responsibility to account to Members in respect of all financial matters regarding the Nation.
- 4.2 Council shall do the following:
  - (a) appoint and remove members of the Finance Authority in accordance with Part 3 herein,
  - (b) report to the Nation's Members as required by this Bylaw, and
  - (c) perform such further or other obligations as may be set out in this Bylaw.

**Part 3**  
**Finance Authority**

**5. Creation of the Finance Authority**

- 5.1 Council shall establish a Finance Authority for the Nation which shall continue in existence notwithstanding changes in its membership from time to time.
- 5.2 Subject to sections 5.3, 5.4 and 5.5, the Finance Authority shall consist of five (5) members, appointed by Council from time to time, as follows:
  - (a) the Executive Director,
  - (b) the Director of Finance, and
  - (c) three (3) members of Council appointed, from time to time, by Council.
- 5.3 The members of Council may only serve on the Finance Authority during the term of their elected office.

**5.4** The Executive Director and the Director of Finance, for so long as he/she remains employed in their position, shall serve on the Finance Authority. In the event that either position is vacant, then Council may appoint a Councillor or an employee of the Nation to serve in place of the Executive Director or the Director of Finance, as the case may be, until such time as the position is filled.

**5.5** A member of the Finance Authority may be removed from office as follows:

- (a) by a majority vote of the Finance Authority, if the member has missed three (3) consecutive scheduled meetings of the Finance Authority for which notice of not less than 48 hours has been given to the member; or
- (b) by a majority vote of Council.

**5.6** A quorum of the Finance Authority shall consist of a minimum of three (3) members.

## **6. Chairperson**

**6.1** The Finance Authority shall select a Chairperson from its Members who shall preside over meetings of the Finance Authority.

## **7. Finance Authority Responsibilities**

**7.1** The Finance Authority shall be responsible for:

- (a) ensuring that the Nation develops and executes such policies and procedures as may be necessary for the implementation of this Bylaw,
- (b) maintaining or prescribing the form of such financial records, accounting and reporting systems in accordance with generally accepted accounting principles and sound financial management,
- (c) reporting to Council and making recommendations to Council on financial matters including the need for development of laws, policies, and procedures,



- (d) establishing rules of procedure for regular meetings and the conduct of business of the Finance Authority, and
- (e) such other matters relating to the financial affairs of the Nation as may be determined by Council.

#### **Part 4 Delegation of Authority**

### **8. Permitted Delegation**

- 8.1** The Nation shall file with the Finance Authority, a record of any delegation of authority to approve expenditures made by the Council. A delegation cannot have the effect of permitting the delegate to approve any expenditure which is not in accordance with an annual budget or to act in a manner inconsistent with this Bylaw.
- 8.2** Without limiting the generality of section 8.1, delegation of the following is expressly permitted and documentation need not be filed with the Finance Authority:
- (a) the conduct of the administration necessary to discharge administrative responsibilities such as staff supervision,
  - (b) the administrative supervision of the compilation and preparation of the overall annual budget,
  - (c) the preparation of annual financial statements and long term financial projections and cash flows as required from time to time by the Finance Authority,
  - (d) monitoring financial compliance with any agreement and funding arrangement entered into by the Nation,
  - (e) administration and supervision of financial records and reporting systems, or
  - (f) the maintenance of records of all receipts and expenditures in such a manner so as to facilitate the annual audit.

**Part 5**  
**Annual Budget**

**9. Budget Preparation**

- 9.1** The Nation shall be required to prepare and file with the Finance Authority, an annual budget.
- 9.2** The annual budget shall include, in separate categories in either the departmental or a consolidated budget, the total amounts budgeted for the remuneration of members of Council and the total amounts budgeted for the remuneration of employees of the Nation.
- 9.3** The annual budget shall be prepared and approved by the Council during the last quarter of the preceding Fiscal Year.

**10. Budget Monitoring**

- 10.1** The Director of Finance for the Nation is responsible for the following:
- (a) monitoring the annual budget on a monthly basis,
  - (b) reporting any annual budget overruns to the Finance Authority, and
  - (c) providing the Finance Authority with an explanation for the annual budget overruns.

**Part 6**  
**Financial Management**

**11. Financial Management Policies**

- 11.1** The Nation shall, subject to the express provisions of any agreement, approve and implement policies respecting financial management, including the following:
- (a) policies and procedures respecting the security and confidentiality of financial information which also include provision for the secured storage of cash, cheques, credit cards, and other financial instruments,

- (b) policies respecting deposits, which shall provide for:
  - (i) the creation of consolidated accounts,
  - (ii) the deposit and crediting of funds to appropriate accounts,
  - (iii) the circumstances in which funds from consolidated accounts may be reallocated to other accounts for investment purposes or program and services delivery,
  - (iv) the crediting of any interest earned on funds invested, and
  - (v) the deposit of surplus funds from segregated accounts at the end of the Fiscal Year.
- (c) policies respecting expenditures which ensure that all financial transactions are in accordance with annual budgets,
- (d) policies respecting payment authorization and invoicing, which shall include:
  - (i) provisions to ensure that no payment may be made for the performance of work, supply of goods or rendering of services unless the charge in respect of such work, goods or services has been authorized by the delegate authorized to approve expenditures, and
  - (ii) a requirement that invoices be provided upon completion of work or supply of goods or services, and
- (e) policies respecting financial signing authorities, which shall include:
  - (i) a requirement that all payments in excess of One Hundred (\$100.00) Dollars be paid by cheque, requisitioned by a document containing sufficient particulars to identify the reason for the payment including the payee, amount, and invoice reference, and
  - (ii) a requirement that the signatures of not less than two (2) of



the persons appointed by the Council to be the signing authorities to sign each cheque drawn on the account of the Nation.

- 11.2** All policies implemented pursuant to this Bylaw shall be filed with the Finance Authority.

## **Part 7 Contracting**

### **12. Policies Respecting Contracting Authority**

- 12.1** Subject to section 13, Council may delegate authority to permit the Nation to enter into contracts for work, goods, or services provided that such contracts are in accordance with an annual budget.
- 12.2** Subject to section 13, contracts for work, goods, or services relating to the Nation not in accordance with an annual budget must receive the prior approval of Council subject to the following:
- (a) the Executive Director and the Director of Finance must confirm that there are sufficient funds to discharge the obligations under the proposed contract.

### **13. Contracting Guidelines**

- 13.1** This section applies to all contracts and capital purchases excepting those contracts which are in the nature of a general retainer with a member or firm which includes members of the Law Society of Alberta or the Law Society of another province of Canada, the Canadian Institute of Chartered Accountants, the Certified Management Accountants of Alberta, or another organization of professional service providers.
- 13.2** The Nation, shall, subject to the express provisions of any agreement, develop and implement policies respecting contracting guidelines, including the following:
- (a) policies respecting the value of any contracts or capital purchases which:
    - (i) may be authorized without going to tender or seeking requests

for proposal,

- (ii) may be made by seeking requests for proposal,
  - (iii) may be made by invitations to tender, and
  - (iv) must be made by public tender;
- (b) policies governing emergency situations or circumstances where telephone bids may be accepted; and
- (c) policies respecting a detailed tendering process.

**13.3** All contracting policies shall be filed with the Finance Authority.

**13.4** The lowest tender received shall normally be accepted unless Council files with the Finance Authority a Council resolution which contains the acceptance of tender other than the lowest tender and the reasons for the acceptance of this tender.

**13.5** All contracts exceeding a value of One Thousand (\$1,000.00) Dollars must be in writing, signed by all parties to the contract and a copy shall be filed with the Finance Authority.

## **Part 8**

### **Grants, Loans and Guarantees to Members**

#### **14. Terms Respecting Grants, Loans and Guarantees**

**14.1** The Nation is prohibited from making a grant, loan or loan guarantee to a Member except under the following circumstances:

- (a) where funds have been provided for such purposes to the Nation pursuant to an agreement, arrangement or other specially funded program,
- (b) where funds have been specifically budgeted and set aside for such purposes, or
- (c) where a guarantee for new housing is required by a financial institution (including Canada Mortgage and Housing Corporation)

and the Member's credit risk is found to be satisfactory after Council has completed its due diligence with respect to the Member.

- 14.2** In all cases, the grant, loan, or guarantee must be made pursuant to a written policy governing the making of such grants, loans, or guarantees and documented by formal application documents and written agreements governing the terms, including:
- (a) maximum grant, loan, or guarantee amounts,
  - (b) the term of any loan or guarantee,
  - (c) repayment obligations, and
  - (d) reasonable debt collection practices.
- 14.3** Copies of all policies, application documents, and agreements respecting grants, loans, or guarantees shall be filed with the Finance Authority together with annual reporting on the status of any collection proceedings undertaken to enforce an agreement respecting a grant, loan, or guarantee.

## **Part 9 Capital Assets**

### **15. Inventory Accounting**

- 15.1** The Nation shall maintain an up to date inventory of all capital assets, including housing, acquired after the implementation of this Bylaw.
- 15.2** The Nation shall adopt policies respecting the proper accounting and management of capital assets which shall include the following:
- (a) disclosure of capital assets on a statement of assets and liabilities as two separate self-balancing accounts: capital assets and equity in capital assets,
  - (b) charging amortization directly to the equity in capital assets account and not reported in a statement of revenues and expenditures,
  - (c) creation of a capital asset ledger showing a continuity of the original cost, purchases, disposals, depreciation, and accumulated

depreciation by category of asset,

- (d) recording of all loan proceeds relating to the financing of capital assets as liabilities in the capital assets fund and not as revenue in the operating funds,
- (e) recording of all loans for acquisition of capital assets to be reflected in a schedule of loans for capital financing or the statement of changes in financial position,
- (f) creation of a capital asset sub-ledger containing the following information:
  - (i) an identification number,
  - (ii) asset description,
  - (iii) acquisition cost,
  - (iv) name of the department given custodial responsibility for the asset, and
- (g) fixing of identification tags to all capital assets.

**15.3** The Nation shall, annually, file a copy of their inventory of capital assets and any capital asset policies with the Finance Authority.

## **16. Capital Asset Management**

**16.1** The Nation shall dispose of capital assets only in accordance with the following conditions:

- (a) the sale, rent or lease of capital assets to third parties, including Members, shall be on the basis of fair market value,
- (b) prior to disposal of any capital asset, the responsible Director shall file a report to the Finance Authority respecting the planned method of disposal and the estimated recovery value, if any, and
- (c) all funds received from the rent, lease or sale of capital assets shall be deposited in the appropriate accounts and reported in the financial

statements.

- 16.2** All capital assets shall be adequately insured against loss and copies of all policies of insurance shall be filed with the Finance Authority.
- 16.3** Without limiting the generality of this section and subject to any applicable laws which the Nation may choose to implement respecting housing, the Nation's Housing Authority or Department shall implement and file with the Finance Authority policies that provide for an open and accountable system of management for housing including efficient records maintenance in regards to the following:
- (a) requests for grants, loans, or other consideration relating to the housing unit,
  - (b) requests for the transfer of occupancy rights in housing units,
  - (c) requests to perform improvements to a housing unit including any claims or possible claims which the Member may make in relation to such improvements, or
  - (d) any other matter required to ensure that the Nation's housing inventory is properly managed and that records are maintained respecting every unit.

#### **Part 10 Conflict of Interest**

#### **17. Conflict of Interest Rules**

- 17.1** Council shall act in accordance with the Conflict of Interest Policy relating to Council which has been approved by Council.
- 17.2** Employees of the Nation involved in any matter whatsoever with the Nation shall act in accordance with Conflict of Interest Policies relating to employees which have been approved by Council.

#### **18. Agreements Voidable**

- 18.1** Any agreement entered into by the Nation in respect of which there has been a breach of Part 10 of this Bylaw is voidable at the discretion of the



Council, as the case may be, and shall be void and of no force or effect upon the delivery of a copy of a resolution of the Council confirming the termination of the agreement with the contracting party or parties as the case may be.

**Part 11**  
**Funding Agreements or Arrangements**

**19. Council Approval**

**19.1** The Council may, on behalf of the Nation approve such agreements or funding arrangements with Her Majesty the Queen in Right of Canada and any department thereof or Her Majesty the Queen in Right of the Province of Alberta and any department thereof or with any other party for the provision of funding for the Nation.

**Part 12**  
**Audit**

**20. Appointment of Auditor**

**20.1** Council shall, by resolution no later than March 1st of each Fiscal Year, appoint an auditor or auditors to audit the books and records of the Nation.

**20.2** The auditor or auditors shall be qualified to perform an audit engagement pursuant to the *Regulated Accounting Profession Act*, RSA 2000, c. R-12 as amended.

**20.3** The auditor shall report to Council.

**21. Administrative Support**

**21.1** The Director of Finance shall be responsible for providing the auditor with access to all documents reasonably required to complete an audit engagement, including:

- (a) all books, records, accounts and vouchers,
- (b) information necessary for the completion of the audit;
- (c) Council resolutions,

- (d) Nation bylaws,
- (e) administration and financial regulations,
- (f) agreements,
- (g) policies, and
- (h) any other related documents.

## **22. Content of Audited Statements**

- 22.1** All audits shall comply with generally accepted accounting principles as established by the Canadian Institute of Chartered Accountants Handbook as well as any applicable funding or other agreements.
- 22.2** The audit shall include a general review of the adequacy of the accounting procedures and systems of control.
- 22.3** The audit shall include a schedule setting out the remuneration and expenses paid to each member of the Council.

## **23. Acceptance of Audited Statements**

- 23.1** Upon completion, and no later than July 30<sup>th</sup> of each year, the auditor shall present the annual audit to Council and to the Finance Authority.
- 23.2** Copies of all audits shall be filed with the Finance Authority.

## **Part 13 Debt**

## **24. Financial Indicators**

- 24.1** The Finance Authority shall ensure that the Nation is operating within the Liquidity Ratio, Sustainability (Net Debt) Ratio and Working Capital to Revenue Ratio which are ratios implemented by Aboriginal Affairs and Northern Development Canada and are attached hereto as Schedule A.

**25. Exceeding The Ratios**

**25.1** In the event that the Nation exceeds any of the Ratios then the Finance Authority shall immediately implement whatever financial measures are necessary to ensure compliance with the Ratios in the next Fiscal Year.

**Part 14  
Membership Access to Information**

**26. Access to Documents**

**26.1** Every Member who attends at the Nation's administration offices during regular business hours is entitled to review copies of any policy documents filed with the Finance Authority under this Bylaw.

**27. Information at Membership Meetings**

**27.1** Council shall call membership meetings to account to Members on financial matters relating to the Nation.

**Part 15  
Offences**

**28. Offence**

**28.1** Any person who intentionally hinders, misleads, or attempts to mislead an auditor, or refuses or fails to comply with a duty as set out in this Bylaw, is guilty of an offence and may, in the discretion of the Chief and Council, be liable to a fine of not more than One Thousand (\$1,000.00) Dollars.

**28.2** Council shall exercise its discretion under section 28.1 in accordance with the rules of natural justice and fairness. For the purposes of this section, natural justice and fairness means:

- (a) the person affected shall receive notice in writing of the allegation of breach of this Bylaw and the particulars of the alleged breach,
- (b) the person affected shall be entitled, within five (5) days of



receiving a copy of the allegation, to make a written statement to the Council setting out his/her response to the allegation,

- (c) a hearing to consider whether there has been a breach and the appropriate penalty shall be convened by the Council, within ten (10) days of receiving the response, and the person affected and any other person who has information relevant to the allegation may appear and make submissions to the Council, and
- (d) Council shall deliver its decision in writing, including the facts which it has relied on in making the decision, no later than fifteen (15) days following the hearing.

**28.3** Notwithstanding section 28.1 and 28.2, a person who violates section 28.1 may be subject to further penalties, suspension or removal from office or employment, including:

- (a) in the case of employees, the provisions of any applicable employment policies or contracts,
- (b) in the case of elected officials, the provisions of the Nation's election laws,
- (c) disciplinary measures which may be undertaken by a professional regulatory body, or
- (d) criminal proceedings.

## **29. Due Diligence Defence**

**29.1** No person may be found vicariously liable of an offence under this Bylaw and no person shall be found guilty of committing an offence under this Bylaw if the person establishes on a balance of probabilities that the person took all reasonable steps to prevent its commission.

## **Part 16 General Matters**

### **30.0 Treaty Rights**

**30.1** This Bylaw shall be interpreted in accordance with the traditions, customs

and values of the Bigstone Cree Nation and nothing in this Bylaw shall be interpreted as to deny, abrogate or derogate any Aboriginal or Treaty right of the Bigstone Cree Nation or its Members.

**31. Invalidity**

**31.1** If any provision of this Bylaw is determined by the Court to be invalid for any reason the provision shall be severed from the Bylaw and shall not affect the validity of the remaining provisions of the Bylaw.

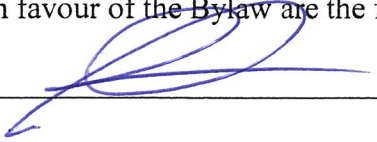
**32. Amendment**

**32.1** This Bylaw may be amended in accordance with the following procedure:

- (a) in the first reading, a draft of the proposed amendment(s) shall be tabled with Chief and Council after which the proposed amendment(s) shall be available to Members of the Bigstone Cree Nation for their information,
- (b) in the second reading, Chief and Council shall review the proposed amendment(s) on a clause by clause basis and during this period shall consult with the Bigstone Cree Nation Membership as deemed necessary by Chief and Council, and
- (c) in the third reading, the proposed amendment(s) shall be voted upon by Chief and Council.


**THIS BYLAW IS HEREBY** made at a duly convened meeting of the Chief and Council of the Bigstone Cree Nation this 10 day of July, 2013.

Voting in favour of the Bylaw are the following Members of Council:

  
\_\_\_\_\_  
Chief

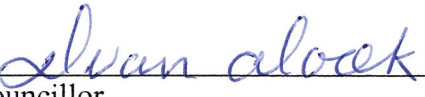
  
\_\_\_\_\_  
Councillor

  
\_\_\_\_\_  
Councillor

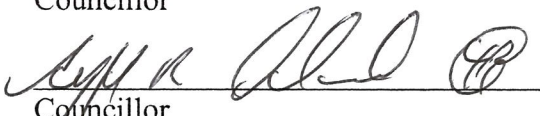
  
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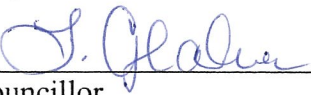
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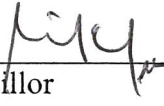
  
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**Schedule A**  
**Financial Indicators**

New financial indicators are needed due to the changes to the Common Government Reporting Model under the standards of the Public Sector Accounting Board (PSAB).

The following three ratios have been implemented by Aboriginal Affairs and Northern Development Canada as the new financial indicators:

**1.) Liquidity Ratio**

Calculated as follows:

$$\frac{(\text{Unrestricted Cash} + \text{Accounts Receivables [Band Member Receivables Removed]} + \text{Temporary Investments})}{}$$

$$(\text{Line of Credit} + \text{Accounts Payable} + \text{Deferred Revenue} + \text{Current Portion of Long Term Debt})$$

The liquidity ratio calculates whether the Recipient has sufficient assets to cover current liabilities over the short term.

The threshold established for this ratio is set 0.9. That means if 90% of the Recipient's current assets are required to address the current liabilities, the Recipient should be able to continue operations in the short term. If the ratio is lower than 0.9, the Recipient may have trouble addressing its current debt obligations.

**2.) Sustainability (Net Debt) Ratio**

Calculated as follows:

$$\frac{(\text{Total Financial Assets} - \text{Trust Funds} - \text{Government Business Equity})}{}$$

$$\text{Total Liabilities}$$

The sustainability ratio calculates the Recipient's ability to service operational and capital obligations over the long term.

The threshold established for this ratio is 0.5. That means if 50% or more of the Recipient's liabilities can be addressed by the assets at disposal, then in the long term, the recipient will be likely able to sustain themselves.

### 3.) Working Capital to Revenue Ratio

Calculated as follows:

$$\frac{(\text{Unrestricted Cash} + \text{Accounts Receivables [Band Member Receivables Removed]} + \text{Temporary Investments}) - (\text{Line of Credit} + \text{Accounts Payable} + \text{Deferred Revenue} + \text{Current Portion of Long Tem Debt})}{\text{Revenue}}$$

The working capital to revenue ratio tests to see if the Recipient is able to cover a working capital deficiency and maintain proper program delivery throughout the year.

The threshold established for this ratio is set at -8% (which is equivalent to roughly one month's revenue). If the coming year's revenue is required to address the outstanding current liabilities, the Recipient may have trouble operating in the short term.

**Negative results for these ratios are used as indicators. Negative results will require further review of the Recipient's financial health prior to taking action.**