

## Financial Stipulation Q & A

This compilation of questions was derived from several permit holders on Oregon BLM managed rivers in reference to the new financial stipulations and the example Customer Receipt Deposit Log that were developed in response to the Special Recreation Permit audit which was finalized in 2015. Some of the questions and corresponding answers may be specific to an individual river, and are noted as such.

Question	Answer
I'm confused about the relationship between Gross Fee and Deposit amount (as they are described on the Customer Receipt Deposit Log) and the dates associated with each. Is Gross Fee better described as the total balance of the customer's invoice on the day they booked the trip (transaction date)?	The gross fee represents only the transaction made on that specific date, not the entire trip cost if multiple transactions occur for that specific trip over time.
I see on the spreadsheet example that "Alpha, A" had a transaction date and gross fee of \$100 on 1/5 (booking date?) and then paid the entire balance on 1/12. It's all nice and tidy because it involves a single payment and all happens within the same month.	Alpha A, actually paid on 1/5, it wasn't deposited until 1/12 with all of the other cash and check transactions.
Let's say that "Alpha, A" booked a \$100 trip on 1/5, paid \$50 on 1/12 and the remaining \$50 on 2/10? On your spreadsheet example, the January total is recording the sum of gross fees, minus discounts for all Transaction Dates in January and not the sum of actual bank deposits for January (which would have added up to \$2040.00). It's probably very simple, but I'm not an accountant and if I could see my example on the spreadsheet, it might make more sense to me.	Totals for monthly deposits minus cash not deposited, have been added to the spreadsheet.
Have an example of how apply multiple payments to the same trip/customer/invoice? All of the outfitters on the wild section of the Rogue take multiple payments for the same trips so that would be really helpful for us to see what that would look like on this sheet. I'm pretty sure that "gross fee" is the total amount taken for that particular payment but the title leads me to think it's the total cost of the trip. So if a trip costs \$995 with a \$100 discount and people pay \$200 one month and the remainder \$895 the next month what would that look like? Having an example would be really helpful.	Multiple payments for the same trip have been added to the spreadsheet.
If we charge \$995 for a trip and the \$10 recreation fee as I understand it we don't need to pay 3% fees on the recreation fee. So we take in a total of \$1005 but only pay fees on \$995. How do we handle the \$10 BLM recreation fee in your example?	If the \$10 is included in the gross fees of a transaction record on the Customer Receipt Deposit Log, then an adjustment is made to your year-end grand total based on the number of clients that paid the user fee and is reflected in your post use report as an adjustment to your gross fees on the Customer Receipt Deposit Log.
In your example spreadsheet, is the "Customer Identifier" the customer's name? If not, could you add a "location identifier" to the table? If it is could you	Done.

change the title "Customer" to "Customer Identifier" so there isn't any confusion?	
In general it would be helpful if the column headings exactly matched the titles listed in the supplemental guidance.	Done.
Most of us take deposits and final payments at different times. Sometimes people make 3-4 or more payments. Your spreadsheet didn't show how to show multiple payments for the same trip.	As long as the client ID for a specific trip matches all the transactions, then an auditor should be able to follow each payment even if they are made at different times.
If there is a way for us to show multiple payments for the same trip then where do discounts get applied to - the deposit or final payment?	Discounts would be applied to the relevant transaction even if there are multiple transactions for a specific client pertaining to a single trip.
What if we deposit money into our business account for something other than a trip? We get income, payments/etc for a lot of other things. Is the BLM asking us to detail every single dollar that comes into our business even if it doesn't have anything to do with running a river trip? If we also need to show you where all of our income is from that will double the amount of effort to create the report and the length of report.	This is where most of the businesses failed in the audit, hence the new stipulations. BLM has no interest in financial transactions that do not pertain to the authorized use. However, if financial transactions contain co-mingled purchases (i.e. funds related to the authorized use and funds not related to the authorized use), it is the permit holder's responsibility to provide clear financial records that "discern" what relates to the authorized use and what does not relate. The auditor's suggestion was an itemized receipt.
Do we have to deposit every cash transaction that we receive from a client, and if not, how do we account for those funds?	No, as a business proprietor, you are not required to deposit every cash transaction though for record keeping purposes, this is the cleanest way. The cash transaction needs to be included on the Customer Receipt Deposit Log and backed up with a receipt or invoice.
This report is going to be long. My best guess for us is 50 pages. Some companies will be MUCH longer.	Clear financial record keeping is a requirement for all businesses by the Internal Revenue Service (IRS). Copies of permit holder's financial records are only requested by BLM during an audit.
The spreadsheet example shows information from several rivers. Do we need to show financials from all the rivers, even if they are FS or don't require a permit?	We do not need records for non-BLM managed rivers. The spreadsheet example was for permit holders that hold several SRP's on more than one BLM river. If the permit holder only has one BLM permit the Location Identifier would always be the same.
Do we need a separate bank account for each permit and/or river?	No you can co-mingle financial transactions, but your record keeping must discern where each transaction is relevant. The location identifier on the Customer Receipt Deposit Log is one avenue that depict where the finances are tied to. The auditor did state that separate bank accounts for each authorized does make financial record keeping easier to understand.
Are we required to get/keep names of all our clients?	No but you need to have some type of identifier, for example an invoice number.
The example shows a deduction column. What kind of	One option is to show a range of fees charged on your

record do we need to keep for those?	price sheet (e.g. returning customers get a 10% discount, etc.).
Are itemized receipts required?	The IRS requires accounting records and suggests you keep supplemental information. A handwritten receipt meets that intent. The Customer Receipt Deposit Log is different from receipts or invoices. The cleanest way is to back up your Customer Receipt Deposit Log up with receipts or invoices for every financial transaction that relates to a BLM authorized permit.
A statement was made that is seems like this is making it rougher on the outfitters and easier on BLM if they have to follow the Customer Receipt Deposit Log example that was sent out.	The auditor said "or similar detailed information" was sufficient and this was mistakenly omitted it the amendment. The example spreadsheet was meant to show a way to record your receipts if you have permits on multiple rivers. The auditor (BLM) only needs records specific to the permit being audited.
What about gift certificates, or payments for future trips where we don't know what river we may float (i.e. the trip might occur on a river managed by BLM or not)?	If the permit holder is unsure where and when a trip will occur, the financial transaction should not be included on the Customer Transaction Receipt Log until the trip actually occurs and only if it occurs on a BLM permitted river. The Log would show that the gross fees were collected at an earlier date and should be backed up with an invoice, and ideally a deposit receipt if the funds were deposited. Even if the funds were collected in a previous year, they are not claimed until the trip occurs on a BLM managed river.
Is lodging in the wild section of the Rogue River a valid deduction?	No, only transportation and lodging before or after the actual trip. See Rogue River Wild Section Operating Plan.
What about co-mingling funds from different rivers, permits, and items sold? Do we need a separate bank account and/or reservation system for each permit?	You don't need a separate bank account or reservation system but if you comingle your funds you need to keep itemized receipts or invoices.
Trips for a specific authorized river are reported on the year they occurred (Post Use Reports or Trip Cards) but fees might have been paid in installments over several years. How can we or the auditor tack this?	If the permit holder knows that the trip will eventually occur on the BLM managed river, then the financial transactions should be included on the Customer Receipt Deposit Log even if the trip occurs in a subsequent year. Each payment (installment) is part of the gross receipts in the year it was collected. If needed, the multiple financial transactions for that single trip can be tracked by the Customer Identifier, and previous years Customer Receipt Deposit Logs.
Do we need to send these records in to BLM yearly?	No, only if you are selected to be audited.
What about the \$10 user fee we collect for the wild section of the Rogue River? BLM calculates that based on our post use report and bills us for it at the end of the year.	If the \$10 is included in the gross fees of a transaction record on the Customer Receipt Deposit Log, then an adjustment is made to your year-end grand total based on the number of clients that paid the user fee and is reflected in your post use report as an adjustment to your gross fees on the Customer Receipt Deposit Log.

Which fees do we have to claim as part of our gross fees (Cancellation fees, gratuities, etc.)?	All fees tied to the trip including gratuities are part of the gross receipts.
Are we charging the lodges on the Rogue River a fee?	We are not charging the lodges a fee. They are not under permit with BLM.