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## Memorandum – Economic Response to COVID-19

**To:** Lead Pastors, Board Chairs, and Church Treasurers

**From:** Aaron Chan, Director of Finance

**Date:** July 22, 2020

As the COVID-19 pandemic continues to batter the world, our churches are beginning to feel the pain of a cash crunch as donations dwindle. In order to help you navigate this unprecedented crisis, we have prepared a list of measures on how to maintain a steady income stream, minimize expenses, and information that may help your employees ride out this pandemic financially.

For any questions, please contact me at [aaronc@pacificdistrict.ca](mailto:aaronc@pacificdistrict.ca).

### Ways to Increase/Stabilize Your Church Income Stream

#### Canada Emergency Wage Subsidy (CEWS) \*Updated July 22\*

Under the [Canada Emergency Wage Subsidy](#) (CEWS) program, the federal government is offering a wage subsidy to all businesses and charities whose revenue has declined as a result of the COVID-19 pandemic. Originally, the program was stated to be in effect for three months, and the subsidy is 75% across the board provided revenue has declined by 30% or more.

The government announced proposed changes to the CEWS on July 17, 2020. The proposed changes would:

- Allow the extension of the CEWS until December 19, 2020, including redesigned program details until November 21, 2020.
- Make the subsidy accessible to a broader range of employers by including employers with a revenue decline of less than 30% and providing a gradually decreasing base subsidy to all qualifying employers.
- Introduce a top-up subsidy of up to an additional 25% for employers that have been most adversely affected by the pandemic.

The new rules are a lot more complicated than the previous ones. [This link includes a full explanation of the new rules.](#)

The main points to be aware of are:

- The CEWS will be extended for three more periods (i.e. Periods 7 to 9 – see explanation below).
- Before going further, you need to know:
  - Period 5 is July 5–August 1
  - Period 6 is August 2-29
  - Period 7 is August 30–September 26
  - Period 8 is September 27–October 24
  - Period 9 is October 25–November 21
- From Period 1-4, a church whose revenue has declined by 30% or more will get a CEWS of 75% of the wages it has paid out. **Starting Period 5, you will be eligible for CEWS no matter how small the decline in revenue is.**
- If the decline in revenue in, say, Period 5, is 50% or over, you'll get a 60% "base CEWS" ([see Table 1](#)) plus a "top-up CEWS" that is based on the % decline of revenue ([see Table 2](#)). If the decline is less than 50%, you'll only get a "base CEWS," the amount of which is dependent on the % decline in revenue ([see Table 1](#)), without the "top-up CEWS." For example, if the decline in revenue is 20% in Period 5, you'll get a 24% CEWS (see example in the [Period 5 column of Table 1](#)).
- Regardless of the above new rules, for Periods 5 and 6, a church with a revenue decline of 30% or more will receive a CEWS rate of at least 75%. See "Safe Harbour Rule for Periods 5 and 6" in the above link.

### **Temporary Wage Subsidy**

The [Temporary Wage Subsidy for Employers](#) is a three-month measure that allows churches to reduce the amount of payroll deductions required to be remitted to the CRA. Your church continues to deduct taxes from your employee's payroll, but you will keep part of the amount deducted without remitting it to CRA, which is, in effect, a financial subsidy to your church.

The subsidy is equal to 10% of the remuneration you pay between March 18, 2020, and June 20, 2020, up to \$1,375 per employee and to a maximum of \$25,000 total per employer. You can either reduce your monthly payroll remittances or you can ask for the subsidy to be paid to you at the end of the year or transferred to next year's remittances. CRA has created a [list of FAQs](#), which should be able to answer most of your questions.

## Canada Emergency Business Account

The new [Canada Emergency Business Account](#) provides interest-free loans of up to \$40,000 to businesses and not-for-profits to help cover their operating costs during a period where their revenues have been temporarily reduced. To qualify, your organization will need to have spent between \$20,000 to \$1.5 million in total payroll in 2019. Up to 25 per cent of each loan, or \$10,000, is eligible for forgiveness if the rest is paid on time (by December 31, 2022). For those unable to repay at that time, the loan can be converted into a three-year term loan at an interest rate of 5%.

Before you proceed with the application for the loan, please make sure that your church does satisfy the eligibility requirement that it generates a portion of its revenue from the sale of goods or services, otherwise you may get yourself into trouble in a subsequent CRA audit. You can apply for the loan through your bank or credit union.

Please also make sure that District Executive Committee (DEXCOM) approval is obtained before committing to the loan. The [Model Church Bylaws](#) states, “The church shall not incur debt, with the exception of church credit card debt and capital leases not exceeding \$30,000 per item, without the approval of the District Executive Committee.” You can apply for the loan before obtaining DEXCOM approval, but before signing the agreement and accepting the funds, DEXCOM approval must be in place.

**Note:** Most, if not all, churches are likely ineligible for this loan. All union, charitable, religious or fraternal organization, or entity owned by such an organization are excluded unless “it is a registered T2 or T3010 corporation that generates a portion of its revenue from the sales of goods or services.” This means that retreat/youth camps are most likely eligible because they generate their revenue from the sale of services. It’s not certain if churches that have a daycare business or rent out their facilities are considered “corporations that generate revenue from sale of services.” You may need to contact your bank to find out.

## Online/Mobile Giving

As churches move to online worship, they need to help congregants continue making donations by introducing online giving. While there are many kinds of online/mobile giving software in the market, it may not be the ideal solution at this time given the lengthy process and learning curve involved in implementation.

Having said that, there's one software called [Tithe.ly](https://tithe.ly) which can be installed from the company's website fairly easily and is user-friendly. Sign up is free and there is no contract or setup fee, although there is a 2.9% fee for every donation. (A donor may choose to cover the fees.) You can visit [Tithe.ly](https://tithe.ly) to find out how it works. Churches can also consider asking donors to donate using e-transfer, online deposit, or via [CanadaHelps](https://canadahelps.com). For giving through CanadaHelps, you can find details of how it works from [their website](https://canadahelps.com).

E-transfer is ideal if your church is using RBC Express (or similar system with other banks). E-transfers using RBC Express allows deposits being made without having to answer security questions and the money can ONLY be deposited to the church's designated account. If your church doesn't use RBC Express or similar bank systems, measures must be in place to prevent the recipient of the email from depositing the money to his/her personal account. One possible solution is to ask the donor to send a separate email to another person with the answer to the security question so two people must be present when the money is deposited to make sure it's deposited to the church's account.

An alternative to e-transfer is direct deposit. Your church will let all congregants know the bank account number of the church. Donors who have online banking can deposit the money into the account and then email the deposit receipt to the church bookkeeper with a note indicating the designation of the donation (mission, general, building, etc.). If the donor doesn't have online banking, they will have to go to the bank, deposit the money to the church's account, and then mail or scan and email the deposit slip to the church.

## **Ways to Minimize Overhead Expenses and Cash Outflow**

### **Mortgage Payments**

Churches with building loans with the District are allowed to repay interest only for the next six (6) months. Further extensions will need to be approved by the District Superintendent. Churches who cannot even afford to pay interest may suspend all monthly installments (i.e. principal and interest) for six (6) months but note that the unpaid interest will be added to the principal amount.

Churches with loans from financial institutions will need to find out from the lender if it is offering a six-month repayment deferral relief plan.

### **Canada Summer Jobs Program Subsidy**

To help the people and small businesses affected by COVID-19, it was announced on April 8, 2020 that employers will be given a subsidy of up to 100% to cover the costs of hiring students. The timeframe for job placement will be extended until the winter because some jobs will start later than usual.

### **Mothballing Your Facilities**

You can trim down your utilities costs substantially by turning off lights and turning down the heat, especially when staff members are working from home.

### **Protecting Idle Property**

Be sure to take measures to keep your church property safe and secure when idle. Risk management information from our insurer is included on page 10-16 that will help you to ensure proper measures are in place to secure your church property.

### **Staff Expenses**

Churches with substantially reduced offering income may have to consider letting certain employees go temporarily. Such employees can apply for Employment Insurance (EI) due to temporary work stoppage, and the church can consider using the District Supplemental Unemployment Benefit (SUB) Plan to top up the EI benefit payment to 90% of the employee's regular salary. See below for more details.

## **Ways to Assist Employees Financially**

### **District Supplemental Unemployment Benefit (SUB) Plan**

In order to assist the employees that are temporarily laid off, the District has recently revised the SUB Plan to allow for EI supplement due to temporary work stoppage in addition to illness, injury, and quarantine. The District registered this plan with Service Canada several years ago and individual churches need to obtain approval from the Board of Elders to implement the plan because it costs your church money. On top of the 55% of regular wages that EI pays, the church must pay an employee 35% of their salary on top. Please see the attached SUB Plan on page 17 for details. Please see the section on the Canada Emergency Response Benefit (CERB) on page 6 regarding SUB Plan payments to an employee receiving CERB.

## **Financial Assistance from Government and Other Organizations**

The Government of Canada has announced several economic measures to assist employees as a response to the COVID-19 pandemic. You may want to communicate these to your employees. These economic measures include:

### **Canada Emergency Response Benefit (CERB)**

The Government of Canada has established the [Canada Emergency Response Benefit \(CERB\)](#). The CERB is a simpler and more accessible combination of the previously announced Emergency Care Benefit and Emergency Support Benefit.

This taxable benefit provides \$500/week and was originally available for up to four months for workers who lose their income as a result of the COVID-19 pandemic. The government has recently announced an [extension of CERB](#) by eight weeks, to a maximum of 24 weeks at the current benefit rate of \$500/week. If you have reached the maximum of 16 weeks, you may continue to apply as you have for the previous 16 weeks of benefits, either through CRA or Service Canada.

Besides covering employees who have lost their job, are sick, quarantined, or taking care of someone who is sick with COVID-19, working parents who must stay home without pay to care for children, and workers who are still employed but are not receiving income because of disruptions to their work situation due to COVID-19 would also qualify for the CERB.

This is important because the church should consider keeping an employee employed without requiring them to work temporarily, and also not paying the employee to enable them to apply for the CERB.

Anyone who has made at least \$5,000 in the previous 12 months or the previous tax year and who has lost their income for any reason due to COVID-19 is eligible for the CERB.

On April 15, 2020, the government announced changes to the CERB eligibility rules to allow people to earn up to \$1,000 per month while collecting the CERB. Before this change, CERB is only available to workers who are or expect to be without employment or self-employment income for at least 14 consecutive days in the initial four-week period, and for subsequent benefit periods, they expect to have no employment or self-employment income.

If a person's application for EI is pending, they do not need to reapply: their application will be transferred to the new system and they will receive the CERB. If people are EI eligible and have lost their source of income, they can apply through the normal EI system but will receive the CERB, not EI.

If people qualify for EI but they gain access to this new benefit, they will still be able to claim EI at the end of the 24-week period covered by the CERB. If they are already receiving EI benefits that expire before October 3, 2020 when the CERB eligibility period ends, they can claim the new benefit at the end of their EI. People cannot, however, receive EI and the new benefit payments at the same time.

A church that laid off an employee earlier can rehire that employee now that there's a wage subsidy. In fact, on April 1, Finance Minister Bill Morneau suggested employers do exactly that. "My message to Canada's employers is this: Get ready to rehire people." he said.

As mentioned above, individuals collecting the CERB may earn up to \$1,000 in employment and/or self-employment income in each of their benefit periods while continuing to receive the CERB. Employers cannot pay employees receiving CERB SUB payments but can pay them "payments in lieu of SUB payment" not exceeding \$1,000. Please note that this \$1,000 includes the payment in lieu of SUB payment, so please make sure the payment in lieu of SUB payment, together with the other income of the individual, do not exceed \$1,000.

### **Employee Benefits for Employees on EI**

For temporary work stoppage due to COVID-19, employees will continue to be eligible to the following benefits:

- Group life insurance (maximum 6 months)
- Long Term Disability (maximum 2 months)\*
- Extended Health and Dental Plan (maximum 6 months)
- Critical Illness (maximum 3 months)

**Note:** It is mandatory for the employee to continue with the LTD plan. In case the employee cannot afford to pay the LTD premium, the church can pay for them and then the employee pays back the church on return to work.

## **Other Government Subsidies**

Other financial support provided by the government includes:

- **Increased GST credit for low and modest-income families:** This one-time payment was made in May 2020. The average boost to income for those benefitting from this measure will be close to \$400 for single individuals and close to \$600 for couples.
- **Canada Child Benefit top-up:** This one-time payment of \$300/child was added to the May 2020 payment.
- **Affordable Child Care Benefit:** see the section “Support for Churches with Daycare Centres” on page 9.
- **Other supports** (which may not be relevant to most of our church employees): such as support to seniors by reducing the minimum withdrawals from RRIF by 25%, a six-month interest-free moratorium on the repayment of Canada Student Loans, etc.

## **BC Hydro Customer Assistance Programs**

The [COVID-19 Relief Fund](#) provides eligible customers a bill credit of up to three months of average electricity consumption and applications open the week of April 6, 2020. The fund also allows eligible small businesses that needed to close due to COVID-19 to have up to three months of electricity charges waived. Customers can call BC Hydro at 1-800-224-9376 for further help.

Customers facing temporary financial hardship and possible disconnection of their service due to job loss, illness, or loss of a family member may also be eligible for BC Hydro's [Customer Crisis Fund](#), which provides access to grants of up to \$600 to pay their bills.

## **Other Financial Support**

The above is by no means an exhaustive list. The District will continue to update the churches when more new support programs come to our attention. Resources and updates are available on [pacificdistrict.ca](http://pacificdistrict.ca). Churches are also encouraged to keep an eye on the latest developments and let us know if we've missed anything.

## **Support for Churches with Daycare Centres**

The Ministry of Children and Family Development has [issued a detailed guidance](#) (see below link) in the form of Q&As on the measures implemented and funding available to daycare providers. A more comprehensive description of the measures taken by the Ministry [is also available](#).

Employees who choose or need to keep their children at home due to COVID-19 may continue to receive the [Affordable Child Care Benefit](#).

### **A Final Word**

Allow me to close with the following passage from Philippians. I'm sure, by the grace of God, we will brave this crisis together.

*Do not be anxious about anything, but in every situation, by prayer and petition, with thanksgiving, present your requests to God. And the peace of God, which transcends all understanding, will guard your hearts and your minds in Christ Jesus.*

*Philippians 4:6-7*

## Maintaining your Church Property throughout the COVID-19 disruption.

Dear Pastor and Board,

I hope that you are staying safe and that your Online Service is working well, as you connect with your church members. During these difficult times, we are seeing the Lord work. Pastors are still asking for a Personal Commitment from their viewers. At our church, 12 people emailed in that they made a salvation decision this week.

We are not sure how long these unusual times will last, and this is a good opportunity for churches to promote and support family growth. If you have not updated your protocols for "Connecting Online", Winning Kids Inc. has an excellent [Online Engagement Webinar](#). They provide up to date information on how to best connect with our Youth/Church Members online in a safe, controlled and accountable manner.

During this period, it is common knowledge that most Church Buildings and businesses are empty. It is important that you have a staff member or volunteer responsible for checking and maintaining the property throughout the week.

Last week one of our JDS Insured Ontario Alliance Churches was broken into. They entered in the back door, cut the power and telephone lines, and

proceeded to empty the Church of Sound Equipment, Computers, and other items.

We suggest you check to see that your Church Burglar Alarm has a cell phone back up system in the event of a power outage or cut lines. Your alarm monitoring company can install it in short order to better protect the property. Every Church should have an alarm system with Cell Backup.

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**Your insurance policy may not respond to a claim if the building is not properly maintained, and could be deemed vacant by your insurance company. It is important to minimize the likelihood of a theft, water or fire claim.**

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Your Insurance Broker is viewed as an essential service, and you can contact them or ourselves with any questions on security and how to best maintain coverage if the building is not in use.

Feel free to contact us at 1-800-917-SAVE (7283) with any questions and we would be happy to assist you.

# Maintaining Your Church Property throughout COVID-19

Here are a few items to consider as properties are closed and may not be used for some time:

## Monitoring of Church Property

- Ensure all fire protection equipment continues to be maintained and in working condition. Water flow switches attached to the sprinkler system should be monitored “off-premises” in order to alert the proper authorities for quicker response to prevent fire/water damages.
- Monitored security alarm systems should continue to be operational, as these facilities are becoming targets of theft. Check with your Alarm company that you have a cell backup system in place.
- Refrigeration systems should be checked for stock spoilage, where applicable.
- Check all doors and check for water damage.
- Frequent visits (preferably daily, but a few times a week) to the property should be conducted and documented to ensure combustible debris does not accumulate on the exterior.
- The accumulation of garbage and/or combustible items on the exterior could show that the building is not being maintained, and be an attractive theft target for unwanted visitors. People know that churches are closed.

- Continue to keep the exterior illuminated to include entrances and office light timers are a good idea.
- See the attached link to one of our carriers [Building Check List](#) that provides a list of items to check.

Please see the following link on [Measures to Protect your Property](#) with a more exhaustive list of areas to inspect and things to consider when your church building is not being used each week

As we all work together over these next week to work and live using social distancing, we trust that God will continue Bless You and your Church Family.

Maintaining a positive relationship with all of your church goes, with phone calls and personal emails, or online engagement, is very important.

For more information on Church Insurance, Maintaining your Church Facility during this unusual time, or updating your Church Policies and Procedures, feel free to contact the insurance professionals at J D Smith Insurance Brokers Inc.

God Bless!

Dr. J.D. Smith, B.A., C.C.I.B. LLD ([email](#))

President - JD Smith & Associates Insurance Broker Inc.

[www.JDSmithInsurance.com](http://www.JDSmithInsurance.com)

1-800-917 SAVE (7283)



**RISK** **Property Management**  
**INSIGHTS**

**COVID-19:**

# Keeping Idle Facilities Safe



During the current COVID-19 pandemic, most businesses and organizations that provide non-essential services have been required to close across Canada. As a result, many buildings and structures will be sitting idle for an unknown period of time.

Organizations are implementing contingency plans such as: home-working, skeleton staffing, social distancing and cleansing regimes to maintain operations. However, for some organizations this is not possible. Following the latest government instructions, these workplaces will now be temporarily shut down.

Idle properties are at a greater risk of arson, vandalism and theft. Property damage can also

occur from more common perils such as burst pipes and leaking roofs. This means that a higher level of attention to the condition and security of your property is needed to manage these situations and reduce the risk of loss.

The following measures and steps have been provided to assist you in mitigating potential losses for idle buildings.

## MEASURES TO PROTECT YOUR PROPERTY

### Maintenance/Inspections

- *If the latest government instruction in your jurisdiction allows, check the premises every 72 hours (or every 24 hours if water is left on due to heating requirements).*
- *Heating systems must be maintained and set to keep the buildings above 10 °C for all areas during the heating season.*
- *If possible, shut-off the water supply, drain pipework, toilet tanks, radiators and associated piping. Turn off the hot water heater.*

**Note:** *some heating systems require water and therefore pipes cannot be shut-off during the heating season. If water is left on due to heating requirements, the property should be checked every 24 hours.*
- *To protect against electrical fires, turn off and unplug any non-essential electrical equipment.*
- *Conduct a thorough external inspection of your property, paying particular attention to items such as lightning grounding cables, eaves troughs, downspouts and roofing materials for damage or theft.*
- *Check oil tanks and gas cylinders for damage, theft or leaks.*

**Note:** *major leaks may have to be reported to your provincial environment department.*
- *Check all exterior lights to make sure they are operational. Consider extending lighting coverage to yards and unlit property entry points.*
- *If practical, remove graffiti from exterior walls.*
- *Check for broken windows or other entry points that may have damage from break-ins or attempted break-ins. Any damage to the buildings or security devices identified at the time of an inspection should be rectified as soon as possible. Take photographs of any damage prior to repairs.*

## Security

- *Maintain services for alarm monitoring systems. Test the intrusion alarm system to ensure it is fully operational.*
- *Make sure the list of key-holders is up to date and that they can be contacted in an emergency.*
- *Ensure security cameras are operational and positioned to cover all entry points/exits and vulnerable areas. Consider having live camera feeds accessible on mobile phones.*
- *Ensure that all doors are locked and dead-bolted and that all windows are closed and locked. Move high value items out of view, or into a safe if one is available.*
- *Remove cash from the premises. Consider leaving a note on the door stating that no cash or valuables are on site.*
- *Use timers to turn lights on/off on the inside and outside of the buildings.*
- *Secure roof hatches and outbuildings (e.g. sheds, garages) with deadlocks or padlocks.*
- *Where there is perimeter fencing, limit yard access by securing gates with locks or padlocks.*

## Personal Safety

- *Designate a person to be responsible (perhaps consider a rotational schedule to spread the workload) for checking the buildings and conducting regular maintenance.*
- *Be mindful of provincial travel and group number restrictions and be mindful of those who are vulnerable to COVID-19. For those at higher risk, consider excluding them from the property inspections.*

## Housekeeping

- *Remove any accumulations of trash, debris, combustibile and flammable materials e.g. cardboard, wood, paper or gas for a lawnmower from buildings and outbuildings.*
- *Remove snow/ice from walkways and driveways leading to the buildings.*
- *Keep the area salted and sanded.*

## Record Keeping

- *Keep a written log recording the dates and times when the buildings was checked, and any actions taken.*
- *Where it is not possible to visit buildings during the pandemic, inspections should be reinstated once travel restrictions are lifted.*
- *Photograph any damage to your property.*

Having employees and volunteers work from home and observe appropriate social distancing protocols during the COVID-19 pandemic keeps everyone safe and aligns with recommended best practices during this difficult time. Taking just a few simple additional precautions can also ensure that your temporarily idle and empty premises are safe, secure and ready for the post-pandemic world.

## About Ecclesiastical

Ecclesiastical Insurance Office plc is a specialist commercial insurance company. We are deeply committed to serving the insurance needs of organizations that enrich the lives of others; to preserving Canada's distinct communities, cultures, and history; and to supporting initiatives that help eradicate poverty and improve the lives of people in need.

V1\_2020-03

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## Protecting idle property Tips for managing a business shutdown

There may come a time when you have to temporarily close your operations and instruct your staff to remain at home. In these instances, you will have to take measures to keep your property safe and secure while idle.

We have prepared a checklist of items to help you ensure that preventative measures are in place should your property become idle. Please review these items and implement them if they apply to your facility.



## Property protection checklist

- Ensure that your fire sprinkler system valves are open, the fire pump controller is on (if you have one) and the system pressures are in the normal operational range.
- If you are planning on conserving energy, ensure that your building's heating is not set lower than 5 C and preferably at 15 C to prevent sprinkler and domestic water pipes from freezing and bursting. (If the temperature is set too low and the heating system fails, your plumbing will freeze faster.) Rooms containing diesel engine drivers for fire pumps should be set at 21 C.
- Ensure that someone visits the property daily to perform visual inspections.
- If you have security patrols, increase the frequency of visits to the property.
- Ensure that your contingency plans are up to date and include relevant phone numbers.
- Outdoor combustible storage should be kept at least 8 metres (26 feet) away from non-masonry and blank exterior walls of the building.
- Remove any overgrowth of vegetation and shrubs from the landscaping to remove hiding places for vandals.
- Access routes to the building should be kept free and clear of any obstructions so that fire departments can access your property easily.
- Remove containers or garbage cans, as well as any trash or fliers. Containers might attract garbage dumping or hazardous waste, such as used motor oil or other chemicals. Vandals and arsonists are more likely to target buildings that appear noticeably vacant or idle.
- Lock interior doors to increase interior compartmentalization and limit access and damage by vandals.
- Ensure that there is adequate nighttime lighting around building perimeters. Conduct weekly checks for burned-out lighting.
- Conduct monthly roof checks to look for roof drains clogged by vegetation, bird nests or vandalism.
- Where practical to do so, block or section off most of the parking lot to prevent vehicles from entering the property.

If you have any questions or concerns, please do not hesitate to contact your broker. For more resources like this, visit [rsagroup.ca](https://www.rsagroup.ca).

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## **Supplemental Unemployment Benefit (SUB) Plan**

The objective of the SUB Plan is to supplement EI benefits for periods of unemployment caused by illness, injury, quarantine, or temporary work stoppage.

### **Eligibility**

- All employees are eligible.
- Only employees receiving EI benefits due to sickness, injuries, training, or temporary work stoppage can receive supplemental benefits under this SUB plan. Verification that the employees have applied for and are in receipt of EI benefits must be performed before SUB payments are made.

### **Amount of Benefit**

- The amount of the EI benefit plus the SUB payment will equal 90% of the lesser of either (1) the employee's normal weekly earnings, or (2) the maximum insurable earnings for that year, as defined by Canada Revenue Agency.
- Payments of guaranteed annual remuneration, deferred remuneration, or severance pay will not be reduced or increased by payments received under the SUB plan.

### **Benefit Duration**

- The SUB Plan benefit is NOT payable while the employee is serving the EI waiting period.
- The SUB Plan benefit will be paid for a maximum of 15 weeks.

### **Record Keeping**

A separate record of all the SUB payments will be kept by the local church.

### **Amendments**

June 2013  
April 2017  
March 2020