Greater Mohawk Valley Land Bank Corporation

Internal Control Policy

The following outlines the policy and procedures used by the Greater Mohawk Valley Land Bank Corporation (Land Bank) to ensure financial controls.

Invoices are reviewed by the Executive Director. After review, the Executive Director prepares, signs, and attaches a voucher for payment. This voucher details the payee, expense account description, project (usually a property address), and class type with which the payment is affiliated and amount to be paid. The Executive Director then causes the voucher and invoice to be delivered to the bookkeeper by electronically submitting them to the cloud-based bill-payment service. The bookkeeper then enters the invoice in the cloud-based bill-payment service, which is synchronized with the Land Bank ledger, in accordance with the voucher.

Two authorized signers are required for all disbursements, except that three authorized signers are required for disbursements of \$15,000 or more. The first signature is that of the Executive Director affixed to the voucher and the second is in the form of a different authorized signer approving/paying the disbursement via the cloud-based bill-payment service or signing a check. This second authorization is required in order for the cloud-based bill-payment service to issue a check or electronic payment to the vendor and may not be completed until the signed voucher is submitted by the Executive Director and the invoice is entered by the bookkeeper. The bookkeeper will not enter an invoice into the cloud-based bill-payment service or prepare checks for signature absent a signed voucher. Authorized signers include: Executive Director, Chairperson, and Treasurer, or as directed by the Board of Directors from time to time.

When a one-time or recurring online payment via debit from a Land Bank bank account is arranged with a vendor, the voucher shall be signed by two authorized signers in order to document two-party approval of the transaction. These transactions shall be reported to the bookkeeper for entry into the Land Bank ledger.

Internal transfers between accounts for routine cash management may be processed by any signatories on the applicable account. Any withdrawals made in person requiring a withdrawal slip shall be authorized by two signatories on the applicable account.

Bank statements are reviewed by the Executive Director and then forwarded to the bookkeeper for reconciling of accounts. Bookkeeping staff shall also have online viewing rights to all Land Bank bank accounts in order to monitor transaction activity on a daily basis for the purposes of fraud-prevention and to reconcile accounts in a timely manner. All bank accounts shall be reconciled on a monthly basis by the bookkeeper and reviewed by the Executive Director and the Treasurer. A summary of account activity will be provided to the Board of Directors at their monthly meetings. This will include a budget-to-actual comparison along with monthly and year-to-date totals.

Financial ledgers are available for inspection by the Treasurer as well as the annual external independent auditor.