

Warren County Board of Supervisors

RESOLUTION NO. 118 OF 2026

RESOLUTION INTRODUCED BY SUPERVISORS ETU, CROCITTO, CONOVER, MADAY, BRUNO, STROUGH AND RUNYON

ADOPTING UPDATED WARREN COUNTY ELECTRONIC-WIRE TRANSFERS AND E-BANKING POLICY

WHEREAS, the Risk and Safety Committee recommended, and the Finance & Budget Committee agreed, to adopt the updated Warren County Electronic-Wire Transfers and E-banking Policy and recommended that the same be advanced to the Board of Supervisors for consideration and approval, now, therefore, be it

RESOLVED, that the updated Warren County Electronic-Wire Transfers and E-banking Policy, annexed hereto as Schedule "A," be and the same is hereby adopted as the official policy for Warren County, and be it further

RESOLVED, that any and all prior Warren County Electronic-Wire Transfers and E-banking Policies, Resolutions or parts thereof inconsistent with the annexed Warren County Policy are hereby repealed effective March 20, 2026, and be it further

RESOLVED, that the Warren County Electronic-Wire Transfers and E-banking Policy will automatically be incorporated into the Warren County Risk and Safety Manual which was adopted by the Warren County Board of Supervisors on January 16, 2026.

SCHEDULE "A"

ELECTRONIC-WIRE TRANSFERS AND E-BANKING POLICY

I. PURPOSE

The Board of Supervisors of the County of Warren recognizes the use of various electronic-wire transfers and e-banking transfers as a faster, easier, and more efficient substitute for paper transactions. The purpose of this policy is to provide a framework of procedures, authorized by the Board of Supervisors, in order to ensure proper protocols are followed for all electronic-wire transfers and e-banking transfers in accordance with the Uniform Commercial Code §4A-201, NYS General Municipal Law §5-a and NYS General Municipal Law §10. This policy shall outline what e-banking activities and electronic-wire transfer funds transfers the County may engage in, and the responsibilities of certain individuals in order to establish a segregation of duties.

II. DEFINITIONS

Accounts Payable: The short-term, current liability representing money a business owes to vendors or suppliers for goods or services purchased on credit.

Authorization Controls: Security measures, policies, and technological protocols that dictate what authenticated users (customers or employees) are permitted to do, limiting access to sensitive data and, or authorizing specific actions like transfers.

Authorized Transfer: A financial transaction that is permitted by the County through a pre-approved agreement or a specific instruction.

Automated Clearing House (ACH): A secure, batch-processed U.S. electronic network for financial transactions.

Bad Checks: Checks issued against a bank account which has insufficient funds.

Bank Account: A contractual agreement with a bank whereby an entity and/or individual may deposit or withdraw money.

Bank Account Number: A unique string of digits that identifies a specific bank account within a financial institution.

Bank Account Transfer: An electronic movement of funds from one bank account to another, either within the same banking institution or between different banks.

Bank Account Validation: A financial process that verifies the status, ownership, and authenticity of banking and financial account information.

Bank Disbursements: The authorized transfer or payout of funds from a company or individual's account to a recipient, such as a vendor, employee, or borrower.

Bank Routing Numbers (ABA Routing Transit Number): A unique, nine-digit code that identifies a specific U.S. financial institution for processing electronic and paper transactions, acting as a digital address for banks to ensure funds go to the right place.

Banking Call Back Provision: A banking contractual clause allowing a financial institution to recover previously paid funds under specific circumstances triggered by financial restatements, employee misconduct or cyber threat activity. Also commonly called a “Clawback Provision.”

Banking Institution: A financial institution, defined by the banking law or a national banking association located and authorized to do business in New York State.

Banking LockBox: A specialized service where a bank maintains a dedicated post office box to receive, process, and deposit customer payments directly into a business’ account. This service accelerates cash flow by minimizing mail and processing delays, improves accuracy, and reduces manual, in-house, accounts-receivable administrative tasks.

Banking Receipts: An official, document-based record acknowledging a completed financial transaction between a customer and a bank, such as deposits, withdrawals, or loan payments.

Board of Supervisors: The Board of Supervisors of the County of Warren.

Bond Payments: The regular interest payments and the final principal repayment made by an issuer (government or corporation) to an investor. These fixed-income payments are typically made on a semi-annual basis, with the total investment returned upon maturity.

Business to Business (B2B) Transactions: Financial transactions, services and credit arrangements occurring between companies.

Business Email Compromise (BEC): Individuals impersonating representatives of a known vendor via email to commit fraud.

Cash Custodian: A designated person or entity responsible for the physical safekeeping, control, and authorized disbursement of cash assets and trust funds.

Cash Management Technology: Digital solutions, software and tools that automate and optimize an organization’s cash flow, including the collection, disbursement and reconciliation of funds.

Cash Transfer Application: A direct payment of money--in physical currency or e-cash--provided to individuals or households by governments, organizations, or private donors to meet basic needs.

Centralized Collection Processing: A specialized unit that handles the billing, collection and management of delinquent or outstanding debts on behalf of multiple agencies, departments or business units.

Check Fraud: A financial crime involving the illegal use of paper or electronic checks to unlawfully acquire funds, goods, or services.

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Check Image: An electronic or digital image of the front and back of an original paper check.

Contract: A legally enforceable agreement between two or more parties.

County: The County of Warren, New York.

County Auditor: Established per NYS CLS County §600. The position created by the Board of Supervisors has responsibility of auditing all claims, accounts, and demands which are made by law and which would otherwise be audited by the Board of Supervisors.

County Financial System: The entirety of the financial systems for the County of Warren, NY.

County Purchasing Agent: Established per NYS CLS County §625. The position appointed by the Board of Supervisors for the term for which the membership of such board was elected, authorized by NYS CLS County §600 and Warren County Board Resolution No. 193 of 1968. The Purchasing Agent and designated Purchasing staff shall review and approve Purchase Orders, and ensure compliance with the County Purchasing Policy as well as State and Federal procurement laws, rules and regulations when applicable.

County Treasurer: Established per NYS CLS County §550. The County Treasurer is the county's Chief Fiscal Officer, responsible for receiving, safeguarding, managing, and disbursing county funds. The Treasurer maintains accurate accounts of all receipts and expenditures, remits required monies to the State, reports financial activity to appropriate local and state officials, and performs other fiscal duties as required by law or requested by the County's Board of Supervisors, ensuring the proper custody and management of public funds.

Dedicated Secure Computer: A computer system isolated for designated tasks such as financial management, crypto currency or handling sensitive data to minimize the attack potential by outside parties by avoiding daily browsing, email or software installations.

Demand Deposit Account (DDA): A bank account allowing immediate, on-demand withdrawal of funds without prior notice or penalties, primarily used for daily transactions.

Department Head: Each elected and appointed County officer responsible for the administration of their respective departments, agencies and offices which collectively constitute the structure of the County's governmental operations.

Department Head Designee: A County employee with statutory authority or designated by the Department Head to act on their behalf.

Direct Deposit: An electronic payment method that transactions funds directly into a bank account eliminating the need for physical checks.

Electronic Banking (E-banking): The use of electronic technology to conduct banking transactions online.

Electronic Funds Transfer (EFT) Services: Computer based transactions that move money electronically between accounts.

Electronic Signature (e-signature): A digital symbol, sound, or process attached to an electronic record, showing a person's intent to agree to its terms, serving as a legally binding equivalent to a handwritten signature for digital transactions.

Encryption: The process of encoding data to prevent unauthorized access.

Front End Access: The client side, user-facing interface of a computer application.

Fund Release Authority: A formal, documented authorization - such as a notice, form or "Special Allotment Release Order (SARO)" or "Notice of Cash Allocation (NCA)" both of which are used in public finance - that permits the transfer, disbursement, or expenditure of funds from a restricted account, budget or trust to a recipient, entity, or for a specific person.

Governmental Accounting Standards Board (GASB): The source of generally accepted accounting principles (GAAP) used by state and local governments in the United States.

Generally Accepted Accounting Principles (GAAP): The standardized, authoritative set of rules, conventions, and procedures for financial reporting in the United States, established by the Financial Accounting Standards Board (FASB).

General Allotment Release Order (GARO): A comprehensive document issued by the Department of Budget and Management (DBM) authorizing all national government agencies to incur obligations for common, routine expenditures within a specified period without needing special clearance.

General Ledger: The core system for organizing a company's financial history, acting as a central record that collects and summarizes every transaction into specific accounts.

Independent Contractors: A self-employed individual or business hired to perform specific tasks for another company or person, controlling how, when, and where they work.

Internal Controls: Policies, procedures and mechanisms used to safeguard assets, prevent and detect fraud and errors, and ensure accuracy and reliability of financial reporting to maintain integrity of the County's accounting and banking systems and promote operational efficiency.

Directive Controls: Internal controls that provide guidance to help achieve the desired objectives of a department and outline responsibilities of individuals and their fiduciary duties outlined within their job description or by policy adopted by the Board of Supervisors.

Preventative Controls: Internal controls that are loss prevention tools to deter the occurrence of errors or other undesirable events using a segregation of duties.

Detective Controls: Internal controls that identify issues on a timely basis when they occur using financial reconciliation, budget or benchmark techniques.

Corrective Controls: Internal controls that identify laws in processes to determine actions needed to correct identified problems.

Journal Entries: A formal, chronological record of a business transaction in an organization's accounting system.

Key Logger (short for keystroke logger): A type of surveillance technology designed to record (log) the keys pressed on a keyboard.

Malware (malicious software): An umbrella term for any software specifically designed to damage, disrupt, spy on, or gain unauthorized access to computer systems, networks, and mobile devices.

Magnetic Ink Character Recognition (MICR): A character-recognition technology used primarily by the banking industry to streamline, process, and clear checks and other documents.

Multi-factor Authentication (MFA): A security system that requires more than one type of proof to verify a user's identity, making it significantly harder for unauthorized access than a password alone.

National Automated Clearing House Association (NACHA): A national association that governs and manages the ACH network and serves as the backbone for the electronic movement of money and data.

Notice of Cash Allocation (NCA): An authorization document issued periodically - usually quarterly by the Department of Budget and Management (DBM) to government agencies, departments, or operating units allowing agencies to pay their operating requirements, goods and services.

Officer: An individual given the title of Officer for the County of Warren.

Online Banking: A digital service allowing customers to securely manage accounts and perform financial transactions.

Originating Depository Financial Institution (ODFI): A bank or financial institution that initiates Automated Clearing House (ACH) transfers, acting as the entry point for electronic payments into the ACH network. ODFIs receive instruction from originators (businesses/entities), ensure compliance with NACHA rules, and process credit or debit entries.

Outsourced Services: An external third-party provider contracted for specific tasks, operations, or functions that could otherwise be done internally, allowing cost reduction in processes or specialized skills.

Payee Information: The identifying details for a person or entity receiving payment, including their name, address, email, FEIN, and bank details - routing/account numbers needed to receive funds from another party.

Payee Portal: A secure, online, self-service platform that enables vendors, contractors, or recipients (payees) to manage their own financial data, update bank information for electronic funds transfer (EFT), view payment history, and submit tax documentation.

Payment Backup Package: The documents required for the submission of a voucher for payment.

Payment Management: Access to view, track, and reconcile payments including invoice status, from a central interface.

Pharming: The fraudulent practice of directing internet users to a bogus website that mimics the appearance of a legitimate one, in order to obtain personal information such as passwords, account numbers, etc.

Phishing and Email Scams: Emails designed to look legitimate to steal credentials or financial information.

Positive Pay System: A bank fraud prevention service where a company sends its bank a list of issued checks (check number, amount, date, payee) electronically, and the bank matches this “issued file” against checks presented for payment, flagging any discrepancies (like altered amounts or forged numbers) for the company to review and approve/reject before they clear, stopping fraud like counterfeit or altered checks.

Provider: A government, non-profit, or private entity including agencies, organizations, or licensed professionals that deliver support to individuals, families, and communities to enhance well-being, safety, and self-sufficiency.

Public Deposits: The deposit of public funds in a bank or trust company which are available for all uses generally permitted by the bank or trust company to the depositing local government for funds collected under the bank’s or trust company’s account agreement or policies.

Public Funds: Financial resources generated, collected, and managed by government bodies (federal, state, or local) through taxation, fees, or bonds.

Purchasing Policy: The policies and procedures adopted by the Board of Supervisors governing the purchase of goods and services for the County.

Remote Deposit Capture (RDC): A service providing businesses with the opportunity to deposit checks electronically from their office or home by scanning them.

Secure Information Submission: A secure method for providing sensitive banking information for electronic fund transfers (EFT).

Security Procedures: A procedure established by agreement between the County and a financial banking institution or trust company for the purpose of (a) verifying that a payment order or communication amending or canceling a payment order is that of the County, or (b) detecting error in the transmission or the content of the payment order or communication. Examples include the use of computer algorithms or other codes, identifying words or numbers, encryption, callback procedures, multifactor authorization, or other similar security devices.

Segregation of Duties: An internal control practice that divides financial responsibilities amongst different people assist in identifying and mitigating fraud and errors.

Social Engineering: The psychological manipulation of people into performing actions or divulging confidential information, exploiting human trust rather than technical vulnerabilities.

Special Allotment Release Order (SARO): A specific authority issued by the Department of Budget and Management (DBM) to government agencies, permitting them to incur obligations for authorized programs, projects or activities not covered by the General Allotment Release Order (GARO).

Token Keys: A token is a physical device that provides a key code you enter when logging into an online

banking account.

Transaction Reversal: The cancellation of a pending or completed payment, where funds are returned to an account from which they were taken.

Trust Company: A trust company as defined by the banking law and located and authorized to do business in New York.

Unauthorized Financial Transfer: A transaction from initiated by someone else without permission or authority, from which the business receives no benefit.

Vendor: An individual or company that provides goods and/or services to the County in accordance with the County's Purchasing Policy.

Vendor Record Maintenance: The update of vendor information by the County Purchasing Department.

Wire Fraud: A federal crime (18 U.S.C. §1343) involving the use of interstate electronic communications - including phone, email, internet, or wire transfer - to knowingly devise or participate in a scheme to defraud someone of money or property.

Wire Fraud Statute: 18 U.S.C. §1343, a federal law criminalizing schemes to defraud using interstate electronic communications (phone, internet, email) for financial gain, requiring a scheme to defraud, intent to do so, and use of interstate wires in furtherance, carrying penalties up to 20 years imprisonment, hefty fines, or both, with harsher penalties for financial institution fraud.

Wire Transfer: A method of electronic funds transfer from one person or entity to another. A wire transfer can be made from one bank account to another bank account, or through a transfer of cash at a cash office.

III. POLICY

The NYS Comptroller identifies interrelated elements of an internal control framework the County hereby adopts to manage its electronic-wire and e-banking financial systems by establishing:

- Separation of control responsibilities for financial integrity in its financial processes to include directive, preventative, detective and corrective controls;
- Monthly risk assessments using tools established by the NYS Comptroller to manage the integrity of the County's financial systems with reports to the Finance Committee;
- Financial policies and procedures for the management of the County's financial transactions shall be supervised by the County Treasurer in partnership with the Finance Committee Chairperson, the Risk and Safety Committee, and the Chairperson of the Board of Supervisors; and
- Methods to monitor the effectiveness of control procedures of County financial transactions in partnership with the County's banking and financial institutions.

A. County Banking and Financial Agreements:

All electronic-wire and e-banking transaction agreements and their relationships must be approved by the County Board of Supervisors. The Chairperson of the County Board of

Supervisors shall be authorized to execute all such agreements with the County's banking and financial institutions for the purpose of electronic-wire transfer and e-banking in a form approved by the County Attorney. In accordance with General Municipal Law §5-a, the agreements must contain procedures for electronic or wire transfers and e-banking, identify the accounts from which such transfers may be made, specify the officers authorized to initiate the transfers, and implement security procedures for approved transfers as defined by Section 4A-201 of the Uniform Commercial Code.

B. County Authorization for Electronic-Wire and E-banking Transfers:

The Board of Supervisors authorizes the County Treasurer; County Clerk; District Attorney; Commissioner of Social Services; and Warren County Sheriff to engage in electronic-wire and e-banking transfers in accordance with all applicable laws and regulations including Uniform Commercial Code §4A-201, NYS General Municipal Law Section §5-a, and NYS General Municipal Law §10 transfers in conformity with the guidelines established by this policy for expenditures approved by the Board of Supervisors and federal and state mandated e-banking transfers.

IV. ROLES AND RESPONSIBILITIES

To ensure the integrity of the County's electronic-wire and e-banking transfers, there shall be a segregation of duties for the financial and banking transfers conducted on behalf of the County operations to include, but not be limited to the following:

A. Board of Supervisors

The County Board of Supervisors shall be responsible for authorizing contractual relationships with County banking and financial institutions and the essential terms of those agreements.

B. Board of Supervisors Finance Chairperson

This policy adopted by the County Board of Supervisors designates the Finance Committee Chairperson, in partnership with the County Treasurer and Risk and Safety Committee, as the primary officer for the administration of this policy subject to audit by the County's external and internal auditors and oversight by the Board of Supervisors.

C. County Attorney

The County Attorney shall be responsible for generating the County's contractual documents and negotiating their terms and conditions on behalf of the County. The County Attorney shall also be responsible for obtaining signatures for the execution of the County's contractual agreements prior to the commencement of any services provided.

D. County Auditor

The County Auditor's Office must approve all invoices or obligations governed by County Law §600 prior to being paid electronically. After an electronic payment has been made the County Auditor or their designee shall verify the amount(s) approved in the County Financial

System. The County Auditor has the authority to reject any invoice or obligation that does not adhere to all applicable County Policies, Local Laws and generally accepted auditing principles and/or has not been approved by the Department.

E. County Departments

County Department Heads shall be fiscally responsible for the budgets under their control and approve expenditures for goods and services rendered as they pertain to their department.

In addition to these specific fiscal responsibilities, each of the following departments have special fiduciary responsibilities that are material to the federal and state relationships they maintain on behalf of the County as follows:

1. County Clerk
2. Warren County Sheriff
3. Warren County District Attorney
4. Warren County Treasurer
5. Commissioner of Social Services

F. County Department of Human Resources

The County Department of Human Resources shall be responsible for the entirety of the wages, and benefits determinations on behalf of the employees of the County of Warren in accordance with the Board of Supervisors approved collective bargaining agreements and other employment-related resolutions. The County Director of Human Resources shall direct the County Treasurer's Office in the payment of employee wages, and benefits transfers including e-banking transfers in accordance with the power and responsibility vested in it by the Board of Supervisors and federal and state laws. The Department of Human Resources shall be the final determination of the payment of County wages, and benefits for employees of the County.

G. County Department of Information Technology

The County Department of Information Technology shall be responsible for the installation and management of the County's data systems in accordance with the Computer Use Policy. Information Technology shall ensure the security and integrity of computers prescribed by this policy for the sole purpose of Electronic-Wire and E-banking transfers.

The County Department of Information Technology shall be granted authority to administer users and computers used for accessing electronic-wire and e-banking including the immediate termination of users and computers in the event of a breach of this policy and/or the County's Computer Use Policy.

Front end access to electronic wire and e-banking systems shall be limited to designated computers. Users shall use a unique username of the sole purpose of accessing designated computers. Information Technology shall limit access to designated computers to only the unique user names that need such access.

Access to designated computers shall be granted only after written notification from a

Department Head to the Director of Information Technology or their designee, identifying the employee and the computer needed. The number of users assigned to designated computers shall be limited to the minimum number of employees necessary to perform the assigned financial duties.

At no time whatsoever, shall mobile and/or remote access be granted or used by any County employee for the County's electronic-wire and e-banking systems.

H. County External Auditors

The County shall employ the services of an external auditor who shall be responsible for annually reviewing County banking and financial transactions for each calendar year and identifying issues in the accounts, protocols and transfers. The external auditors shall work with the County Finance Committee Chairperson and the County Treasurer to present their audit findings and work with the Board of Supervisors to mitigate risk issues identified in the course of that audit.

I. County Purchasing Department

The County Purchasing Department shall have the sole responsibility for establishing and maintaining all vendor records for the County's financial management system including establishing vendors with which the County does business, certifying the information provided from the vendors is correct, and managing any changes made to vendor information within the County's financial management system including contact and e-banking information. No other department and/or individual within the County may change a vendor's information.

J. County Self-Insurance Department

The County Self-Insurance Department shall be responsible for the fiscal management of the County's self-insurance program and shall direct the Treasurer in e-banking transfers related to workers compensation and NYS Disability programs in accordance with the power and responsibility vested in it by the Board of Supervisors and federal and state laws.

K. County Treasurer

The County Treasurer is elected as the County's Chief Fiscal Officer and has responsibility for administering this policy on behalf of the Board of Supervisors. The County Treasurer shall ensure the segregation of financial duties within their department designating authorized users; establishing internal procedures in partnership with the County Finance Committee Chairperson and County Risk and Safety Committee; ensuring compliance and training with federal and state recognized and mandated generally accepted accounting principles; overseeing banking and financial relationships; and assisting in the identification and mitigation of risks associated with the County's electronic-wire and e-banking relationships.

L. Risk and Safety Committee

The County Risk and Safety Committee shall have responsibility for supporting the County's

electronic-wire and e-banking financial management system through the development and implementation of policies and protocols in accordance with the County's Property and Casualty Risk Management Program. The Risk and Safety Committee shall partner with the County Treasurer, County Auditor, and County Purchasing Agent to monitor the County's financial risk management program and report its finding to the Finance Committee and Board of Supervisors on a monthly basis.

V. SCOPE

The County recognizes that the security is of the utmost importance in managing the integrity of its banking and financial transfers. In accordance with this policy, information in the specific processes associated with electronic-wire and e-banking shall be deemed privileged and confidential. County electronic-wire and e-banking transfers may be used for, but not limited, to the following:

- A. Cash Receipts Including the Electronic Depositing of Checks**
- B. Cash Disbursements Including Preauthorized Debit Payments, ACH Vendor Payments, EFT Wire Transfers, Electronic Federal Tax Payments, and Electronic NYS Tax Payments and NYS Retirement Payments**
- C. Bank Accounts and Bank Reconciliation Procedures Including E-banking services**
- D. Billed Receivables**
- E. Procurement**
- F. Payroll**
- G. Independent Contractors**
- H. Outsourced Services**
- I. Lockboxes**
- J. Accepting Credit and Debit Cards**
- K. Accepting Payments Via a County Website**

VI. PROCEDURES

County electronic-wire and e-banking activities shall comply with applicable federal and state laws and regulations as set forth by the Uniform Commercial Code §4A-201, NYS General Municipal Law Section §5-a, and NYS General Municipal Law §10. The County shall:

1. institute internal controls that ensure authorization, validity, accuracy, completeness and the proper recording of transfers with appropriate segregation of duties and audit trails.
2. proactively support risk management initiatives to assist in mitigating operational, cybersecurity, fraud and liquidity risk associated with electronic-wire and e-banking transfers.
3. obtain and provide written documentation for all County electronic-wire and e-banking transfers including documentation sufficient to evidence purpose, authority, amount, beneficiary, and multi-authorized approvals PRIOR to any such transaction taking place; AND
4. ensure "Least Privilege Access" to limit to the minimum segregated limited system access to perform assigned duties.

VII. VENDOR AND PAYEE MANAGEMENT

The County's Vendor Management shall be entrusted to the County's Purchasing Department prior to any

electronic-wire and e-banking transfers, the County Purchasing Department shall ensure the following:

A. Vendor Onboarding:

Prior to any electronic-wire and e-banking transaction taking place with County funds, vendors and/or other payees shall complete a standardized enrollment form providing their legal name, tax identification number, remittance address, bank account information and the name of one person authorized to change the Vendor's bank account information. This information shall be validated through independent written verification including, but not limited to bank acknowledgments or voided checks.

B. Changes to Payee Information:

Any requested change in a vendor's payee information shall require the request be made in written form on the County's Purchasing Department Form (Attachment A) AND on company letterhead executed by a known, designated company employee and verified through an independent call back to a known company number and an approval by a company supervisor not involved in the requested change.

C. Employee Direct Deposit:

Payroll or self-insurance direct deposit enrollments and changes shall follow controls established by the Department of Human Resources or the Self-Insurance Department as may be applicable for those types of payments.

VIII. GENERIC PROCEDURES FOR ELECTRONIC FUNDS TRANSFERS

The following County generic procedures shall be put into place for electronic-wire and e-banking transfers:

A. Permissible Use:

Electronic-wire and e-banking transfers may be utilized for County vendor payments, employee payroll and reimbursements; debt service; intergovernmental transfers, grants and aid; and other payments as may be authorized by this policy.

B. Initiation:

Department Heads and/or their designees shall be responsible for the preparation of the payment backup, including the invoice or obligation, accounting code, and approved payee details. The payment backup package must evidence the lawful appropriation, encumbrance, and compliance with County policies. Departments shall be responsible for verifying budget availability prior to submitting payment requests. **All requests for payment for product and/or service rendered to the County must be made and submitted by the Department within thirty (30) days receipt of the vendor's invoice provided all County protocols have been met, or reference is made to an Emergency transaction as described below.**

C. Approval and Dual Authorization:

All County electronic-wire, ACH and e-banking transfers shall require dual authorization

within the banking platform by two (2) authorized employees and/or officials who shall be given separate security credentials for the authorization. The County Treasurer shall be responsible for determining the authorized employees and/or officials for these transfers.

D. Release:

Following the approvals mandated by this policy, the County Treasurer and/or their designee with fund release authority separate and distinct from the County Treasurer initiator shall transmit the electronic-wire and/or e-banking funds through the banking system using bank and/or financial institution multi-factor authentication procedures.

E. Pre-Note and Micro-deposits:

First-time electronic-wire and e-banking paid payees shall use pre-note or micro-deposits when feasible before a first regular payment is made to that vendor. This same procedure shall also be utilized when a payee's banking details are changed and/or updated.

F. Recurring Payments:

Recurring electronic-wire and e-banking transfers must be re-validated at least annually or as changes occur, with reapproval and confirmation of banking details, routing numbers and purpose.

G. Reversals and Reclamations:

Electronic-wire and e-banking returns, reversals, and payroll reclamations shall be processed consistent with bank and financial institution procedures within their respective timelines. The County Treasurer shall provide written documentation outlining the cause, corrective action taken and be responsible for notifying the appropriate parties. This information shall be updated monthly and provided to the County Finance Chairperson and Risk and Safety Committee.

H. Emergency Transactions:

In exigent circumstances, the Board of Supervisors may authorize an expedited electronic-wire and e-banking transfer consistent with the protocols established by this policy and the emergency exemption under Section III(C)(1) of the Purchasing Policy. Any exigent circumstances material to electronic-wire and e-banking transfers must be reported to the County Finance Committee and Board of Supervisors within thirty (30) days of occurrence.

IX. TRAINING AND AWARENESS

County employees who have fiduciary duties assigned within this policy shall complete and certify they are in compliance with the **County's Computer Use Policy** and its **Red Flag Identity Theft Prevention Policy** upon hire before being given data access and annually thereafter for continuing access of the County's financial systems. This policy, the **County's Computer Use and Red Flag Identity Theft Prevention Policy** shall be prominently available to those employees for ease of reference and accountability.

X. COMPLIANCE

Compliance to this policy and its internal protocols are mandatory. Violations may result in disciplinary action, revocation of data access, recovery actions and/or an immediate referral to law enforcement or other authorities as may be deemed appropriate by the Board of Supervisors. All activities associated with this policy shall comply with the federal and state law for generally accepted accounting principles including bank and financial transfers subject to sanctions and/or money laundering; tax reporting and withholding obligations and IRS reporting. The County Treasurer shall monitor and report any changes in electronic-wire and e-banking guidelines and standards provided by the NYS Comptroller to the Board of Supervisors Finance Chairperson. No change to the County's electronic-wire and e-banking practices may be made without the express permission of the Board of Supervisors after a review by the County Risk and Safety Committee and the Finance Committee.

XI. MONITORING, REPORTING AND REVIEW

The County Treasurer shall be responsible for implementing and maintaining generally accepted accounting principles in the monitoring, reporting and review of the County's electronic-wire and e-banking processes. The County shall utilize the internal controls prescribed by the NYS Comptroller and federal and state generally accepted accounting principles. The following generally accepted protocols shall be followed for the compliance associated with this policy:

- A. Monthly Reporting:** The County Treasurer's Office shall include electronic-wire, ACH and e-banking volumes, exceptions including but not limited to: policy deviations, bank errors, returns and security incident(s), fraud attempts and control enhancements in their monthly Financial Report to the Finance Committee. Any significant concerns shall be immediately escalated to the Finance Chairperson and the Risk and Safety Committee for further action.
- B. Periodic Review:** This policy shall be reviewed and updated as needed by the County Risk and Safety Committee, Personnel and Higher Education Committee and Board of Supervisors as changes may be made to generally accepted accounting protocols put forth by the NYS Comptroller, but at least on an annual basis.
- C. Internal Event Notification:** In the event of a suspected unlawful activity, loss identification of a significant control weakness and/or a security or cyber breach to the County's financial management systems. County staff shall be educated to immediately notify the Department of Information Technology. The Director of Information Technology shall assess the security breach and immediately shut down the County's financial management systems until such time as the county's financial system integrity is ensured. The Director of Information Technology shall inform the County Administrator, County Treasurer, County Auditor, County Purchasing Agent, and County Attorney of the security breach as information is available. The County Finance Chairperson and the Chairperson of the Board of Supervisors shall also be informed of the suspected unlawful activity.

The County Treasurer shall partner with the County's financial and/or banking institution, County Purchasing Agent, County Auditor and the Department Head working with the Vendor to identify and mitigate the suspected unlawful activity reporting the risk mitigation efforts to the County Finance Chairperson, County Chairperson of the Board of Supervisors, and Risk and Safety Committee.

- D. External Event Notifications:** In the event of a suspected unlawful activity, loss

identification of a significant control weakness and/or a security or cyber breach to the County's financial management systems from an external party and/or law enforcement agency, the County official apprised of the system security issue shall immediately notify the Department of Information Technology. The Director of Information Technology shall immediately shut down the County's financial management systems until such time system integrity is ensured. The Director of Information Technology shall inform the County Administrator, County Treasurer, County Auditor, County Purchasing Agent, and County Attorney of the security breach as information is available. The County Finance Chairperson and the Chairperson of the Board of Supervisors shall also be informed of the suspected unlawful activity.

XII. CONTINGENCIES AND SPECIAL CONTROLS

Department Heads shall have an immediate responsibility to inform the County Board of Supervisors, Finance Chairperson, County Administrator and County Attorney for any deviation from the policy and protocols associated with this policy.

The following contingencies and special controls shall be in effect for this policy and its electronic-wire and e-banking transaction protocols:

- A. New Banking Services:** The adoption of any new electronic-wire and e-banking services must be approved by the Board of Supervisors.
- B. Third Party Platforms:** Any use of third party payment platforms must be approved by the Director of Information Technology, County Treasurer and County Attorney and include contractual security obligations and be able to integrate with County financial management systems.

ATTACHMENT "A"

WARREN COUNTY PURCHASING DEPARTMENT

1340 State Route 9
Lake George, NY 12845
Telephone: (518) 761-6538
Fax: (518) 761-6395



Julie A. Butler, Purchasing Agent
Jason M. Shpur, Deputy Purchasing Agent
Preston L. Allen III, Purchasing Assistant

Vendor ACH Payment Registration Form

This form is to be completed by the vendor desiring to be paid via electronic ACH for future payments received from Warren County. Submit this form to the Warren County Purchasing Agent to the address above. Please allow up to three (3) weeks for processing before electronic payments begin.

Vendor Business Name/Last Name, First Name:	
County Vendor # (if known):	
Street Address/PO Box:	
City, State, Zip:	
Bank Name:	
Routing/ABA Number:	
Name on Account:	
Account Number:	
Checking or Savings?	<input type="checkbox"/> Checking <input type="checkbox"/> Savings
Name & Title of Individual Authorized to Request Changes to Account Information:	
Email and Phone Number:	
ACH Payment Authorization Agreement	
I authorize and request Warren County to automatically electronically deposit any payment due to me as a vendor of Warren County to my bank account listed above. I understand that this agreement may be terminated by me or Warren County at any time by written notification.	
Authorized Signature:	
Printed Name/Title:	
Date:	

SWORN to before me this

_____ day of _____

20__.

Notary Public: _____

You MUST attach a voided check from the bank account listed above to this form.