

Warren County Board of Supervisors

RESOLUTION NO. 515 OF 2025

RESOLUTION INTRODUCED BY SUPERVISORS WILD, DRISCOLL, ETU, MADAY, BEAN, PATCHETT AND MERLINO

ADOPTING THE WIRE TRANSFERS AND E-BANKING POLICY

WHEREAS, the County Attorney requested, and the Personnel, Administration & Higher Education Committee agreed, to adopt the Wire Transfers and e-Banking Policy, as approved by the Warren County Risk and Safety Committee, and recommended that the same be advanced to the Board of Supervisors for consideration and approval, now, therefore, be it

RESOLVED, that the 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.

SCHEDULE “A”

WIRE TRANSFERS AND E-BANKING POLICY

I. PURPOSE

The Board of Supervisors of the County of Warren recognizes the use of various e-banking transactions including wire transfers and e-banking activity 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 the proper protocols are followed for all e-banking activity 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 funds transactions the County may engage in, and the responsibilities of certain individuals in order to establish a segregation of duties.

II. DEFINITIONS

Automated Clearing House (ACH): An electronic network for transferring funds in the United States using a batch processing system.

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

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.

County: The County of Warren, New York.

County Auditor: Established per NYS CLS County §600.

Electronic Banking (e-banking): The use of electronic technology to conduct banking transactions online, eliminating the need to visit a physical banking branch utilizing e-banking platforms, dedicated mobile apps, or other digital channels. E-banking services include account management; payments and transfers; digital payments; deposits; and online investments.

Electronic Funds Transfer Services: Computer based transactions that move money electronically between accounts, replacing paper methods like checks. Examples include direct deposits, debit card purchases and the payment of bills.

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 systems and promote operational efficiency.

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: The County's funds.

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 to prevent fraud and errors.

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

III. POLICY

E-banking uses technology to streamline the processing and recording of receipts and disbursements, while reducing the cost of processing these transactions. Receipts, disbursements and transfers in proper circumstances can be processed via electronic funds transfer (EFT) services, whether transferring funds from a savings to a checking account at the same bank, or making a payment to a vendor's bank across the country.

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

The Board of Supervisors hereby authorizes the County Treasurer and/or their designee(s), to engage in e-banking in accordance with all applicable laws and regulations including Uniform Commercial Code §4A-201, NYS General Municipal Law §5-a and NYS General Municipal Law §10 authorizing the use of electronic or wire transfers in conformity with the guidelines established by this policy. The County Treasurer and/or their designee(s) are hereby authorized to initiate wire transfers when appropriate based on approved expenditures by the Board of Supervisors.

The Board of Supervisors recognizes that most banking institutions no longer provide cancelled paper checks to their customers, but instead offer an electronic image obtained online. As such, the Board of Supervisors authorizes the acceptance of these electronic images in lieu of cancelled checks in accordance with General Municipal Law §99-b(2).

IV. SCOPE

County e-banking activities shall be used for, but not limited, to the following:

1. E-banking services (reviewing account balances, retrieving bank statements, downloading copies of cancelled checks, making stop payment orders, etc.)
2. Electronic depositing of checks received
3. Pre-authorized debit payments
4. ACH vendor payments
5. EFT or wire transfers
6. Electronic Federal Tax Payment Systems (EFTPS)
7. Electronic State Tax Payment System (Prompt Tax)

V. PROCEDURES

A. County Auditor Procedures:

1. The County Auditor's Office reviews all electronic payments that are governed under County Law Section 600 and processed through the County Financial System. These payments must first be audited by the County Auditor's Office and approved for payment by the County Auditor and/or their designee. The County Auditor's Office then notifies the County Treasurer's Office to set up the required electronic banking process to make the payment on a specific date determined by the County Auditor and/or their designee. The County Financial System Edit Listing is provided to the County Treasurer's Office for their approval and processing of the batch in order for the proper general ledger codes to be charged for such payment.
2. After the electronic payment has been made and the County Financial System batch has been processed the County Treasurer's Office must provide the County Auditor's Office with a statement showing the details of the electronic payment. This statement should include the vendor paid, the amount of the payment, the EFT number assigned by County Financial System as well as the date the payment was processed. The County Auditor and/or their designee shall then verify that the electronic payment matches the County Financial System payment record and file the statement with the documents supporting the payment.

B. County Treasurer Procedures:

1. **Preparation of Disbursement Documentation:**
 - a. The County Treasurer and/or their designees shall prepare or receive a *Disbursement Form* along with all corresponding backup documentation (e.g., invoices, authorizations, or supporting contracts).
 - b. The County Treasurer and/or their designees shall review the backup materials to ensure they match the details provided on the *Disbursement Form*.
2. **Verification and Authorization:**
 - a. The *Disbursement Form* must be verified and signed by the County Treasurer and/or their designees to authorize the payment set-up.
3. **Setup of Electronic Payment:**
 - a. Once approved, the County Treasurer and/or their designees shall proceed to

- set up the electronic transfer (wire/ACH) in the online banking platform.
4. **Dual Authorization and Security Verification:**
 - a. Following the dual authorization policy, the County Treasurer and/or their designees shall log into the online banking system to review and approve the payment.
 - b. As a security measure, the County Treasurer and/or their designees shall receive a phone call from the bank containing a unique security access code which must be verified before the transaction may be approved.
 5. **Post-Approval Verification:**
 - a. After the wire/ACH has been approved, the final confirmation printout is returned to the clerk.
 - b. The County Treasurer and/or their designees shall perform a next-day verification to confirm that the transaction was processed correctly.
 6. **Financial System Entry:**
 - a. Once verification is complete, the electronic transfer is recorded (“mirrored”) in the County’s financial system to ensure accurate accounting and reconciliation.

VI. SAFEGUARDS

All electronic fund transfers shall be reviewed by the County Treasurer’s Office who reviews the bank statements. The County Treasurer’s Office and/or their designee(s) shall be responsible for initiating wire and e-banking transfers pursuant to this policy. The County Treasurer’s Office shall be responsible for the County’s e-banking monthly reconciliation and review in order to provide safeguards relating to separation of duties. The County Treasurer’s Office is the central point for coordinating, approving and submitting electronic transfers, as well as ensuring proper documentation and accuracy. All banking transactions for the County shall be conducted on a secure computer network.

The County Treasurer and/or their designee(s) shall be responsible for ensuring that employees with electronic access to County bank accounts who leave County employment are properly removed from the accounts, effective as of the date of termination.

VII. MONITORING

The County Treasurer shall be responsible for implementing adequate internal controls for each of the e-banking methods utilized. An effective internal control system shall include, but is not limited to, segregation of duties, proper authorization and adequate documentation for all electronic transactions. As such, the County Board of Supervisors authorizes the County Treasurer to serve as the primary administrator for the County’s e-banking activity for all accounts for the purpose of receipt of alerts of all wire transfers, and in order to view all e-banking activity. The County Treasurer shall be responsible for presenting any findings of concern or questions directly to the Board of Supervisors.